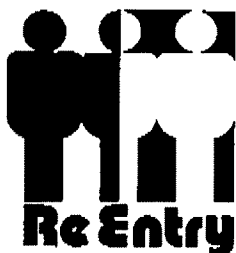


# Exhibit B



1435 Reed Street  
Lakewood, CO 80214  
(303) 238-3700 Voice/TDD  
(303) 237-3705 Fax

Helen M. Woodard, M.A.  
Rehabilitation Counselor

Rehabilitation Services, Inc.

March 19, 2009

**RE: SHANNON KAY CAVANAUGH**

Shannon was referred for a rehabilitation evaluation, needs assessment and preparation of a life care plan. She was seen at home with her husband and in the ReEntry Sandy, Utah office for an interview and testing, and her medical records were reviewed. Dr. Cory Frogley, Dr. Erin Bigler, and Dr. George Zinkhan provided information by telephone. Dr. Dan George provided information in written form. Additional care providers were contacted for information and additional contacts were made regarding services and costs. Labor market information was obtained as part of this assessment.

#### **HISTORY**

Shannon is a twenty-six year old married woman who lives in Woods Cross, Utah with her husband, Brad Cavanaugh, and their daughter, Keirah, four years of age. Shannon was born in Layton, Utah in 1982 and graduated from Davis High School in 2000. She attended Davis Applied Technology College (DATC) in 1999 while still in high school and completed a certified nursing assistant (CNA) course. In 2000, Shannon also completed courses in medical anatomy and physiology at DATC.

From 1999 to 2001, Shannon worked for Bountiful House as a CNA. She left in 2001 and started working at Heritage Place, still working as a CNA. Shannon remained at Heritage Place until 2002, and then started working at ABI Consulting (a drug testing company). Shannon was employed at ABI until 2003, when the company was sold. She then started working at Discover Card in the retention department and did inbound and outbound calling. Shannon remained at Discover until 2005. In 2005, Shannon started working at Blue Line Services, another drug testing company where she is presently employed. Shannon works as a drug specimen collector. Shannon performs on-site drug collections, pre-employment screening, random drug testing, and reasonable suspicion drug screening. Shannon is an independent contractor for Blue Line Services and her work hours

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**Shannon Kay Cavanaugh**

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vary from week to week. Shannon was off work from December 2006 through April 2007 because of the injury she sustained on December 9, 2006. Shannon reports that since the taser incident, she has worked fewer hours and less consistently.

On December 9, 2006, Shannon and her husband had a conflict at their home. Shannon left the house and walked to a park nearby. Brad stayed at home with their daughter. Shannon does not have any recollection of the incident, but understands that while she was gone, Brad called the police, as he was afraid for her safety. When Shannon returned home from the park, she was tasered by a policeman and fell backward and hit her head. She was treated at the scene by paramedics and was transported by ambulance to Lakeview Hospital for care. Shannon was treated at Lakeview and then was transferred to the University of Utah on December 9, 2006 for inpatient care. Shannon underwent a surgical procedure on December 14, 2006 and she was discharged home on December 16, 2006. Shannon presently sees a chiropractor and a headache specialist for follow-up care.

#### **MEDICAL RECORDS REVIEW**

On December 9, 2006, Dr. Matthew Feil stated that Shannon arrived via ambulance at Lakeview Hospital after she had been tasered by police at her home. Dr. Feil reported that Shannon had been having suicidal thoughts and anxiety. She was intoxicated, agitated, uncooperative, and hostile. Shannon had apparent trauma and slurred speech and reported that she had a headache. Shannon was intubated with an endotracheal tube, her c-spine was immobilized, an IV was started and medication was administered. Testing was ordered. Dr. Feil assessed Shannon with a traumatic epidural hematoma without loss of consciousness, alcohol intoxication, a scalp laceration, and a skull fracture. Shannon was transferred to the University of Utah for further care.

On December 9, 2006, Dr. Janet Lee stated in a University of Utah emergency department report that Shannon arrived via ambulance after she was tasered by police outside her home and fell and hit her head. A CT scan showed a left epidural hematoma, a right sylvian fissure subarachnoid hemorrhage, a left frontal intraparenchymal hemorrhage, and a left temporal contusion. The CT scan also showed a small focus of pneumocephali with a right-sided skull base fracture. Dr. Lee stated that Shannon needed to remain in a cervical collar and have ongoing neurological examinations. Shannon was placed on IV medication.

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Dr. Benjamin Curtis stated in a University of Utah Admission note on December 9, 2006 that Shannon had an epidural/subdural hematoma, a positive midline shift, and a laceration to the posterior scalp that was cleaned and closed with staples.

Dr. Daniel Fults stated in a neurosurgery note on December 9, 2006 that Shannon had declining levels of consciousness at the scene of the accident and was transported for emergency care. Shannon was examined in the surgical intensive care unit and Dr. Fults stated Shannon was intubated and mechanically ventilated and she had swelling and a contusion in her occipital region. Dr. Fults' impression was an intracerebral and epidural hematoma consequent to fall. Dr. Fults recommended Shannon be monitored in the surgical ICU for neurological changes.

On December 11, 2006, a psychiatric evaluation was done on Shannon at the University of Utah with illegible handwriting and an illegible signature.

Dr. Brian Miller stated on December 11, 2006 in an ear, nose, and throat consultation that Shannon reported right hearing loss with a crunching type of tinnitus. Dr. Miller assessed a right temporal bone fracture without a conductive hearing loss on exam and recommended a hearing test to evaluate subjective hearing loss.

On December 14, 2006, Dr. Fults performed a right temporal craniotomy for evacuation of an epidural hematoma. Shannon's post-operative diagnosis was a right temporal epidural hematoma. Dr. Fults noted that Shannon had been observed for the past few days and continued to have a headache. A repeat CT scan showed an increase in the right temporal epidural hematoma and midline shift and surgery was performed to resolve this issue.

Dr. Fults stated in a discharge summary on December 16, 2006 that Shannon's principal diagnosis was an epidural hematoma. Shannon had a craniotomy and was transferred to the neurosurgery floor. She received daily physical and occupational therapy. Dr. Fults discharged Shannon home with medication and instructions for follow-up care.

An emergency room record from University of Utah with an illegible signature stated that Shannon was seen on December 20, 2006 for a headache. She was diagnosed with acute cephalgia status post subdural hematoma. She was given IV medication for pain. Shannon was discharged home with care instructions and medication prescriptions.

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On December 27, 2006, Dr. Todd Ashby stated that he removed staples from Shannon's craniotomy procedure.

Dr. Fults stated on January 8, 2007 that Shannon was seen for a post-operative visit. Dr. Fults noted that Shannon had a ligamentous injury subsequent to the fall that affected her cervical spine demonstrated by T2 signals in the posterior cervical musculature and interspinous ligaments as seen on an MRI scan. Shannon reported that she was having headaches and dizziness, as well as intermittent pain in her lower back that radiated into her buttocks on the right side. Shannon also reported that she had moderate neck stiffness. Dr. Fults recommended outpatient physical therapy to increase her neck mobility and upper body strength, as well as focusing on her lower spine.

Dr. Cory Frogley, chiropractor, stated in an initial exam on January 9, 2007 that Shannon reported neck and back pain and moderate headaches that occurred frequently. Shannon reported that her neck pain restricted her movement and the pain radiated into the posterior right cervical area, the posterior right upper shoulder, the right deltoid area, and the right medial upper thoracic region. Her neck pain increased with coughing, looking down or up, stress, and repetitious movements. Shannon's back pain was intermittent and increased with fatigue. Dr. Frogley diagnosed Shannon with a neck sprain, neuralgia, neuritis, unspecified radiculitis, a thoracic sprain, lumbago, and lumbar facet syndrome.

On January 10, 2007, Dr. Frogley performed a detailed single system musculoskeletal examination and did an adjustment with some improvement and motion in Shannon's mis-alignment at L5. Shannon received chiropractic care from January 10, 2007 through December 13, 2007.

On February 1, 2007, Dr. Frank Warren III stated in a letter that he had evaluated Shannon for her right temporal bone fractures. Shannon reported that she had vertigo with distinct spinning and this occurred with or without movement. Shannon also reported she had some high pitched tinnitus in both ears but no distinct hearing loss. Dr. Warren felt that Shannon's vertigo was possibly explained by benign positional vertigo. Dr. Warren recommended that Shannon see him as needed.

Dr. Fults stated on February 12, 2007, that Shannon had headaches that were episodic and had characteristics of migraines. Dr. Fults' impressions of Shannon were headaches, probably related to migraine syndrome rather than consequent to her head injury, ligamentous

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injury of the cervical spine consequent to the fall, and low back pain consequent to the fall. Dr. Fults prescribed medication and stated he would see Shannon as needed.

On May 3, 2007, Dr. Kevin Call stated that Shannon was evaluated for her headaches. Shannon reported that she had developed headaches since her injury on December 9, 2006. Shannon's headaches began in the occiput or base of the skull and radiated through the retro-orbital area bilaterally, greater on the right than the left. Shannon stated she had aura, with visual changes (seeing black dots) in the upper right quadrant of her vision, for up to 30 minutes prior to headache onset. She became nauseated and vomited, and experienced photophobia, phonophobia, and diplopia with the headaches. She reported becoming irritable when she got a headache and she was intolerant to cold temperatures. Shannon also reported paroxysms of a swimming sensation in her head once to twice a month but not necessarily with motion. Dr. Call stated that Shannon had a history of headaches that began her junior year of high school and were occipital in nature and were likely tension headaches. Dr. Call stated that Shannon had a traumatic brain injury with an epidural bleed in December of 2006 and noted that Shannon's headache symptoms met the classifications for migraine headaches. Dr. Call prescribed medication to treat the headaches and establish appropriate sleep patterns. Dr. Call stated that Shannon's epidural bleed would be managed by Dr. Fults.

Dr. Call reported in a medical record on October 18, 2007 that Shannon was seen for follow-up regarding her headaches. Shannon reported that her new medication decreased her headache intensity but she continued to have frequent headaches. She had a headache one to two times a week which lasted most or all day. The headache pain was a pressure sensation with a left-sided throbbing component. Shannon reported occasional nausea, light and sound sensitivity, scotomata, temperature intolerance, difficulty sleeping, and muscle aches. Dr. Call assessed continuing headaches and discussed the possibility of increasing medication or trying other medications. He recommended follow-up care.

On October 7, 2008, a note from Community Chiropractic and Wellness Group with no signature stated that Shannon reported neck pain, headaches, and lower back pain. Her headaches and neck pain occurred at least twice a week. Shannon was diagnosed with cervical segment dysfunction, laxity of ligaments, thoracic segment dysfunction, lumbar segment dysfunction, sacral segment



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dysfunction, and hypolordosis. Shannon received chiropractic care from October 7, 2008 through February 11, 2009.

On November 11, 2008, Dr. James Snyder and Dr. Erin Bigler stated in a neuropsychological evaluation that Shannon reported daily headaches, reduced concentration and motivation, memory difficulty, irregular bowels, and intermittent depression since she sustained the moderate traumatic brain injury on December 9, 2006. Dr. Snyder and Dr. Bigler performed a records review and administered neuropsychological testing, and it was their impression that Shannon sustained a moderate traumatic brain injury with positive neuro-imaging findings indicative of structural brain damage.

On July 10, 2008, Dr. George Zinkhan stated that Shannon was seen for follow-up regarding her headaches. Shannon reported that the frequency of her headaches increased to three to five times a week. Shannon reported that she had been training for a marathon and after she finished running, she developed a migraine headache about an hour and a half later. Shannon stated that her migraines began at the back of her skull on the left side and radiated bilaterally to the retroorbital area. She had nausea, vomiting, photophobia, and phonophobia with her headaches, as well as an aura of upper quadrant black dots in her vision that occurred thirty minutes prior to her headache onset. Shannon stated that she woke frequently during the night and was concerned her migraine medication was making her irritable. Dr. Zinkhan assessed migraine headaches that were poorly controlled. He prescribed medication for Shannon, adjusted her current medication, and advised her about establishing good sleep habits.

#### **PROVIDER/EMPLOYMENT CONTACTS**

Dr. Cory Frogley stated in a telephone conversation on February 23, 2009 that Shannon was being seen for injuries she sustained in the taser incident. Dr. Frogley was treating Shannon for neck and back pain, and headaches. Shannon was seen originally three times a week for eight to twelve weeks, and then the frequency of sessions was reduced. Dr. Frogley stated that Shannon had not been seen recently and he would need to re-evaluate her to make recommendations for care.

On February 24, 2009, Dr. Bigler stated in a telephone conversation that Shannon underwent a full neuropsychological evaluation with testing in November of 2008. Shannon had difficulties with visual memory problems. Shannon sustained a significant traumatic brain injury in December of 2006.

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She has recovered well in many areas, but temporal lobe injuries tend to cause more emotional difficulties than cognitive difficulties and this is the area where Shannon is having the most difficulty. She reports headaches, reduced concentration, motivation, and memory, as well as depression. These difficulties are all likely related to her traumatic brain injury. Shannon's headaches are especially debilitating. Shannon's condition is likely permanent and as she ages emotional issues (including motivation and depression) will increase. Shannon needs psychiatric care with medication management and psychological counseling with a clinical psychologist or a neuropsychologist. Shannon will initially need these services to establish therapeutic goals and then she will likely need ongoing services to life to maintain her condition. Shannon will need to have 1 to 2 neuropsychological evaluations over the next 1 to 2 years to evaluate her recovery. She will then benefit from a neuropsychological evaluation done later in life as she is more likely to develop dementia and post-traumatic epilepsy because of the brain injury. Shannon will likely need a job that uses her established skills. If her job changes or she needs to move into a new vocation, she will need skills training and vocational rehabilitation services.

Ms. Kate Webb, Shannon's supervisor at Blue Line Services, stated in a phone call on March 5, 2009 that Shannon is a contracted employee. Shannon is responsible for having client paper work filled out, going to test sites and collecting urine samples from clients, and then shipping the samples for testing. Her job requires both sitting and standing. Shannon works on average 5 to 10 hours per week, but the hours increase when Blue Line Services is busy. She makes \$300 to \$500 per month (she is paid per test), but if she works more, she will make more money. Ms. Webb stated that since the taser incident in December of 2006, Shannon is often unable to go collect drug samples when called because of her severe headaches. Ms. Webb stated this happens on a monthly basis. Ms. Webb also reports that she has to remind Shannon about her work schedule and the hours she is scheduled to work because she often forgets.

On March 10, 2009, Dr. Dan George, chiropractor, stated in a letter that Shannon presented to his office on October 7, 2008 with neck pain and associated headaches, and lower back pain that began following a taser incident on December 9, 2006. Shannon reported that she had sustained a brain injury from the taser incident, but Dr. George stated he has not treated Shannon for this. Dr. George stated that Shannon has undergone a conservative course of



**Shannon Kay Cavanaugh**

chiropractic care for the treatment of the strain/sprain that is complicated by laxity of ligaments, hypolordosis of the cervical spine, cephalgia, and cervical segmental dysfunction. Shannon's current treatment plan is a chiropractic visit one time per month, and this should be continued for 12 months. Dr. George recommended that Shannon be seen as needed for increased episodes of pain caused by her normal activities, that will be brought on by the accelerated degenerative changes caused by the traumatic injury. Dr. George stated that any future care would be considered palliative in helping Shannon deal with the pain and discomfort that affect her standard of living. Due to the excessive motion in Shannon's neck caused by the taser incident, Shannon should avoid any activities that cause a strain in the cervical region of her spine. These activities may include and are not limited to wearing helmets, riding roller coasters, snowboarding, etc. Dr. George states that in his professional opinion, Shannon's injuries are permanent in nature.

## CONTACTS

On March 10, 2009, Ms. Jane Bodily, Shannon's sister, stated in a telephone conversation that Shannon's personality is different since the taser incident. She is more irritable and her irritability increases in social situations. Shannon's headaches are severe and she has one constantly. The family is often helping take care of Shannon's daughter when she has severe headaches.

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Shannon is more forgetful since the taser incident. She has difficulties remembering time and often does not arrive on time to events or work. She also has difficulties multi-tasking and when she is overwhelmed, she becomes frustrated. Ms. Bodily stated that before the taser incident, Shannon was able to function well. Since the incident, she has difficulties functioning in daily activities, taking care of her daughter, and completing her job.

Ms. Amy Weruli, Shannon's friend, stated in a telephone conversation on March 10, 2009 that since the taser incident, Shannon has constant and severe headaches. Shannon needs medications to control the headache so she is able to function on a daily basis.

#### CURRENT STATUS

Shannon states that before the accident, she did not have headaches, but since the accident, she has a headache every day and experiences a migraine at least twice a week. Shannon reports she has pain over her scar on her head when she brushes her hair. Shannon sees a chiropractor and a headache specialist, and a massage therapist for treatment of injuries related to the accident. Prior to the accident, Shannon reports that she slept well. Now, she has insomnia and her headaches wake her up one to two times a week. She sleeps on a special pillow that supports her head and states she needs to nap during the day but usually cannot do this because she is taking care of her daughter.

Shannon reports that before the accident, she was able to drive or ride in a car without difficulties. Since the accident, she has difficulties while driving or riding in a car. She cannot sit for very long at a time and she needs to walk around and stretch. Shannon states she now has problems focusing while driving and she often forgets where she parks her car in the parking lot. She now uses a cell-phone with a GPS system to aid her.

Prior to the accident, Shannon performed all of the basic cooking and cleaning tasks around her home, as well as performing organizing tasks. She also was able to do yard work. Since the accident, Shannon states that she has trouble starting tasks. The household tasks are overwhelming, and the up and down movements of cleaning (mopping, dusting, bending, scrubbing, etc.) cause increased headaches. Shannon still does some yard work, but she reports the tasks take longer to complete.

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Shannon exercised often before the accident. She participated in sports and enjoyed jogging outdoors or running on a treadmill. She went to the gym often and lifted weights regularly. Since the accident, Shannon reports that exercising triggers her migraines. When she runs, she gets headaches and so she does not go to the gym very often.

Before the accident, Shannon reports that she had good relationships with family members and friends. She went tent camping, snow skiing, boating, and water skiing. She enjoyed going on vacations and she and her family members and friends went to amusement parks. Shannon states that she went to friends' houses to visit and spend an evening out. Since the accident, she does not travel anywhere without bringing her medications. She has not gone camping, boating, or water/snow skiing since the accident. When she does go to an amusement park, she rides the kiddie rides.

Shannon and her husband had planned to have another child, but have put this off since her accident.

#### **VOCATIONAL TESTING**

The following are tests Shannon was given and the scores she attained. The achievement test results are reported as grade levels, and the aptitude testing is reported as percentile levels, where the norm group used for comparison is given. The score is then read as a ranking out of 100, where Shannon's percentile rank can be read, "scored higher than 'X' out of 100" in this norm group with "1" being the lowest rank and "99" being the highest rank.

#### **Achievement Testing**

##### **Tests of Adult Basic Education**

Reading	11.1 grade level
Mathematics Computation	7.5 grade level
Spelling	10.8 grade level

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### Aptitude Testing

The Bennett Mechanical Comprehension Test measures the ability to perceive and understand the relationship of physical forces and mechanical elements in practical situations.

#### Scores By Industry

Manufacturing/Production

Percentile Rank 20

Flanagan Industrial Test - Coordination is a test of an individual's speed and accuracy in following a path with a pencil.

Entering First Year Students at One University

Percentile Rank 52

The PTI Oral Directions Test assesses an individual's ability to follow instructions presented orally.

Inspectors at a Southern Bearings Manufacturer

Percentile Rank 85

The Revised Minnesota Paper Form Board Test measures the capacity to visualize how two-dimensional objects would look if they were fitted together.

#### Vocational Rehabilitation Clients - Various Occupations

A Western Center

Percentile Rank 90

The SRA Nonverbal Form measures general abstract reasoning ability. It requires the individual taking the test to decide which one picture in a group of five pictures does not belong. No reading is required.

Industrial Norms

Percentile Rank 31

The SRA Verbal Form measures the ability to accurately complete questions and problems of varying kinds.

Secretaries

Percentile Rank 35

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### Dexterity

The Bennett Hand-Tool Dexterity Test assesses proficiency in using common hand tools, including a screwdriver, wrenches, and an adjustable wrench.

Employees and Applicants in a Manufacturing Company  
Percentile Rank 65

The Crawford Small Parts Dexterity Test is a performance test designed to measure fine eye-hand coordination and consists of two parts. Tweezers are used to place pins/collars in the first section of the test, and a small screwdriver is used to place small headless screws in the second section.

FEMALE NORM GROUP  
Assembly Job  
Percentile Ranks  
Pins/Collars 64  
Screws 43

The Minnesota Rate of Manipulation is a test of manual dexterity. The test involves doing a variety of different movements using one hand or both hands to manipulate small round objects.

The Turning Test  
Percentile Rank 85  
The One-Hand Turning and Placing Test  
Percentile Rank (Right) 77  
Percentile Rank (Left) 80  
Two Hand Turning and Placing Test  
Percentile Rank 40  
Placing Test  
Percentile Rank (Right) 93  
Percentile Rank (Left) 90  
Displacing Test  
Percentile Rank (Right) 98  
Percentile Rank (Left) 98

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The Purdue Pegboard measures fine finger dexterity. Small pegs, brads and collars are placed in the pegboard.

General Industrial	
Percentile Ranks	
Right	10
Left	40
Both	17
Total	19
Assembly	26

#### CONCLUSIONS

Shannon sustained a brain injury when she was tasered in front of her home and fell, hitting her head. She was hospitalized for treatment of a subdural hematoma, which required surgery. Since her release from the hospital, she has had severe headaches which occur frequently, and for which she takes migraine medication. She also has chronic neck and upper back pain which is treated by the chiropractor. These problems interfere with her ability to care for her child, and to do her usual household tasks. The headaches are a particular problem in this area, and she calls on her family to help with child care on a frequent basis, so that she can try to manage her headache pain. We have recommended in the attached life care plan that Shannon address these issues by having some paid assistance with child care, and by having regular help with the heavier housework. In addition, because organization is problematic for her, it will also likely be useful for her to have periodic help with household organization.

Shannon is also having substantial difficulty in returning to her usual social and recreational activities, although she is attempting to get back to the things she used to do. She does leave family gatherings due to increased headache pain and other pain, and she is not able to do the more physically demanding things she did prior to the injury.

Shannon has returned to the work she was doing at the time of the injury, and she is able to set her own hours. She and her supervisor note that Shannon is working fewer hours now. Shannon has indicated that increasing her hours by much at this point is not practical because she has such severe headaches which are not controlled with her medications. She had expected to eventually be able to work full time, but since the injury, this does not seem realistic. Shannon would likely have difficulty in being at work and remaining at work through the severe headaches, and this lack



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of reliability is likely to create significant problems for her in a full time work environment. Her present work situation, where she is able to set her own hours and does not work full time is likely a better long term work situation for her.

Most employers do not provide sick leave to part time employees, and employers who do provide sick leave to full time employees allow about five to twelve days a year for this unscheduled leave. For the most part, they require employees to work the hours they are scheduled to work, be productive during that time, and not leave work due to health problems. Shannon is likely to have significant difficulty in doing this.

In addition to the problems posed by the headaches, Shannon also has difficulties due to the neck and upper back problems she has had since the taser incident. These problems are likely to restrict her from doing work where she sits for extended periods of time to do computer or paper work, or doing work where she does repetitive reaching or lifting. These difficulties are likely to significantly reduce the types of work she is able to do. The other difficulties associated with the brain injury, which are primarily visual memory difficulties, and emotional difficulties, also pose additional issues in employment in the longer term. These are characterized by Dr. Bigler as problems with depression and motivation. These generally make initiating tasks and following through with them to completion more effortful and problematic, and so impact the kinds of work Shannon is likely to be able to do in the future.

These problems also create significant difficulties for her in managing her childcare responsibilities, and in keeping up with her usual household tasks. We have provided in the life care plan for services to help her in this regard. Costs are for services provided through an agency, and so include the costs of recruiting, hiring, screening, and doing payroll.

Shannon will benefit by having case management services to help her deal with problems with medical and care provider billings, make sure she follows through with recommended treatment, and helps her to arrange for appropriate services. The life care plan provides for the costs of these services.

The life care plan was prepared after contacts with Shannon and her husband, various other individuals who know her, current providers, and with Dr. Bigler, the neuropsychologist. Costs are for the Salt Lake City and surrounding area and are in today's costs with no

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**Shannon Kay Cavanaugh**

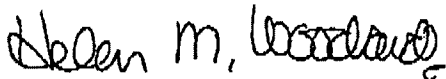
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regard for inflation. If additional information is received, or if Shannon's circumstances change substantially, the report and life care plan may be supplemented. In addition, follow up contacts may yield additional information which may require a supplemental report.

She spends considerable time over the course of a month resting during headaches and trying to sleep so that they will be gone when she awakens. This creates problems for her in child care.

If you have questions, please call.

Respectfully submitted,



Helen M. Woodard, M.A.  
Rehabilitation Counselor



Stephanie Birely, B.S.  
Rehabilitation Counselor

Original: Kathleen McDonald, Attorney

PRELIMINARY LIFE CARE PLAN  
SHANNON CAVANAUGH  
March 19, 2009

MEDICAL CARE

Headache Specialist

\$250 to \$300 per visit  
1 to 2 times a year, to life  
Annual Total: \$250 to \$600

Chiropractor

\$50 to \$90 per visit  
1 visit per month, for 12 months  
Total: \$600 to \$1,080

then 4 to 6 visits per year as needed  
Annual Total: \$200 to \$540

Per Dr. George, after 12 months of chiropractic visits, Shannon will need to be seen on an as needed basis for episodes of pain. This will be a lifelong or indefinite need.

Psychiatry Initial Evaluation

\$175 to \$205  
One Time Cost: \$175 to \$205

Psychiatry Sessions: \$150 to \$170

Frequency and duration to be determined after initial evaluation.

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Shannon Cavanaugh Life Care Plan

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**MEDICATIONS AND SUPPLIES**

**Prescription Medications**

Imitrex

Topamax

Annual Total: \$6,210 to \$7,088, to life

**COUNSELING**

Psychological Counseling Evaluation: \$185 to \$220

One Time Cost: \$185 to \$220

Psychological Counseling Sessions

\$110 to \$135 per hour

24 to 36 hours per year for 1 to 2 years

Annual Total: \$2,640 to \$4,860

then 12 sessions per year, on average, thereafter

Annual Total: 1,320 to \$1,620

**CASE MANAGEMENT SERVICES/ADVOCACY**

\$75 to \$100 per hour

5 to 10 hours per year, to life

Annual Total: \$375 to \$1,000, to life

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Shannon Cavanaugh Life Care Plan

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#### EVALUATIONS

Neuropsychological Evaluation: \$1,300 to \$2,100

1 to 2 evaluations over the next 1 to 2 years

One Time Total: \$1,300 to \$4,200

Per Dr. Bigler, as Shannon ages she will be more likely to develop dementia and post traumatic epilepsy. She will need to have a neuropsychological evaluation to establish a baseline, between age 55 and 65.

One Time Cost: \$1,300 to \$2,100

#### VOCATIONAL REHABILITATION

Vocational Rehabilitation, including assessment and counseling

1 to 2 times over next 5 to 15 years

\$2,000 to \$3,000 each episode

Child Care Services or Preschool (through age 5)

\$10 to \$12 per hour

12 to 16 hours per week

Annual Total: \$6,240 to \$9,984, duration depending on number of children

Organizational Services

Annual Total: \$200 to \$300 per year, to life

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Shannon Cavanaugh Life Care Plan

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**THERAPIES**

Massage Therapy Sessions

\$75 to \$125

1 time per week for next 12 months

Annual Total: \$3,900 to \$6,500

Then reevaluation and additional sessions on an as-needed basis

**EQUIPMENT**

Equipment

Cost

Replacement (to life

Unless otherwise noted

Specialized Pillow

\$50 to \$85

Every 1 to 2 years

Memory Foam or Other Comfortable

Mattress

\$1,100 to \$2,800

Every 10 years

Organizational/Memory Tools

(Calendars, notepads, etc.)

\$200 to \$300

Annually

GPS System

\$200 to \$450

Every 3 to 5 years



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Shannon Cavanaugh Life Care Plan

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**REPLACEMENT SERVICES**

House Cleaning Services

\$35 to \$40 per hour, 2 to 3 hours per week, to life

Annual Total: \$3,640 to \$6,240

Nanny/Child Care Services

\$12 to \$18 per hour

6 to 8 hours, 2 to 3 times per week through youngest child's age 6 (start of full-time school)

Annual Total: \$7,488 to \$22,464

**HELEN M. WOODARD, M.A.**  
**1435 Reed Street**  
**Lakewood, Colorado 80214**  
**1-303-238-3700**

### **EDUCATION**

B.A., University of Colorado, Boulder, Colorado, 1968  
Major: Philosophy

M.A., University of Northern Colorado, Greeley, Colorado, 1970  
Major: Special Education with Major in Rehabilitation Counseling

### **WORK HISTORY**

1978 to Present	<u>Rehabilitation Counselor/Member, Board of Directors</u> ReEntry Rehabilitation Services, Inc. (previously ReEntry Vocational Services, Inc.)
1975 to 1987	<u>Private Practice</u> Rehabilitation Counseling; Educational and Residential Placement of Handicapped Children and Adults
1975 to 1980	<u>President and Rehabilitation Counselor</u> Woodard Associates, Inc.
1970 to 1975	<u>Rehabilitation Counselor</u> Colorado Division of Rehabilitation

### **RESEARCH**

"A Synthetic Estimate of the Number of Disabled People in Colorado in Need of Vocational Rehabilitation Services" (1979)

"Entry Level Wages of Rehabilitated People Entering Employment in Colorado, 1976 to 1979" (1979)

### **PUBLICATIONS**

Woodard, H. (2001) 'Basic Life Care Planning Issues', Trial Talk 50, 36-37.

### **CERTIFICATIONS**

American Board of Vocational Experts (May 1989)  
Diplomate

Certification of Disability Management Specialists Commission  
(Formerly Certified Insurance Rehabilitation Specialist) (March 1991)  
Certified Disability Management Specialist

Commission for Case Manager Certification (November 1993)  
Certified Case Manager

Commission on Certification of Work Adjustment and  
Vocational Evaluation Specialists (April 1987)  
Certified Vocational Evaluation Specialists

Commission on Disability Examiner Certification (April 1998)  
Certified Life Care Planner

### **PROFESSIONAL EXPERIENCE**

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**Rehabilitation Counselor and Case Manager** - Counseling and assessment of individuals with disabilities regarding vocational and career planning, and work-related problems; counseling people with disabilities regarding psychological adjustment to disability, life style change, personal and career issues; working with employers to modify jobs to accommodate people with disabilities; providing information and assistance to employers for implementation of the Americans with Disabilities Act; planning and implementation of rehabilitation programs; analyzing jobs and conducting labor market surveys; coordinating training and educational efforts, rehabilitation programming, therapies and medical interventions; placing people with disabilities into jobs and doing follow up for maintenance of employment.

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**Life Care Planner** - Preparing life care plans for children and adults with severe or catastrophic injuries or illness and ongoing need for treatment and care; interviewing clients, parents and other care givers; assessing client needs; coordinating services for individuals with severe and catastrophic disabilities; planning for future needs; testing and evaluating people with disabilities to determine levels of cognitive functioning, gross and fine motor skills, emotional and behavioral functioning, and social skills levels; developing recommendations for future medical care needs by contacts and coordination with physicians, therapists, and care providers and past experience; determining probable costs for future medical care, physical, occupational, and speech therapies, attendant and nursing care needs; special educational services, adaptive equipment, home modifications, household services, and other ancillary services; implementing residential and treatment programs; coordinating funding; assisting clients with severe disabilities to apply for assistance under governmental programs, including Social Security Disability, Supplemental Security Income, Medicaid, Medicare, Aid to Families with Dependent Children, low income housing, etc; managing cases of individuals with disabilities; implementing recommendations of medical care providers by identifying appropriate individuals and programs.

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**Small Business Manager** - Supervising rehabilitation counselors, life care planners and researchers, and secretarial staff; selecting and administering health, life and disability insurance programs; selecting and administering pension program; overseeing accounting; performing tasks associated with successful operation of small business enterprise, including main location and satellite offices.

FEDERAL AND STATE DISTRICT COURT TESTIMONY

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2005 DEPOSITIONS OF HELEN M. WOODARD

01/06/05	Joshua Hunt, a minor child, by and through child, by and through his legal guardian, Jared Hunt vs. Michael S. Lieber, Sr., dba Family Auto Center, Fred W. Harrison and Carman N. Harrison. Atty: Kevin Flesch	030604477	Second District Court, Davis County, State of Utah
01/07/05	Gino Junior Griffin, a minor, by and through his parents and next friends, Gina Griffin and Reginald Griffin, Gina Griffin and Reginald Griffin, individually and as husband and wife, vs. Banner Health System, an Arizona corporation, dba Desert Samaritan Medical Center; Cigna Healthcare of Arizona, Inc., an Arizona corporation; Joseph D. Mott, M.D., P.C., an Arizona corporation; Joseph D. Mott, M.D., individually; et al. Atty: James Leonard	CV2002-23726	Superior Court, Maricopa County, State of Arizona
01/20/05	Sean Kaito Fears, by and through his parents and next friends, Charles Fears and Yuko Fears vs. John Pritko. Atty: Glenn Pressman	04CV1106	District Court, El Paso County, State of Colorado
02/17/05	Mariana Filo and Filani Filo, as the natural parents and guardians of Franky Filo, a minor, vs. State of Utah and University of Utah Health Sciences Center Atty: Norm Younker	0309026959	Third Judicial District Court, Salt Lake County, State of Utah
02/18/05	Clint Butterfield and Heidi Butterfield Individually, and on Behalf of their minor daughter, vs. L. Jeffrey Chappell, M.D., Sevier Valley Hospital, IHC Health Services, Inc., and John Does, I-X Atty: Allen Young	020600390	Sixth Judicial District Court, Sevier County, State of Utah

02/22/05	Rick Troup vs. Joni Wolever Atty: Brad Hall	2003CV832	District Court, Larimer County, State of Colorado
02/25/05	Jalyn McCoy, a minor, by his Next Friend, Regina McCoy vs. The Detroit Medical Center, a Michigan Corporation, Harper Hospital, a Michigan Corporation, and Dolly Kerin, M.D., jointly and severally. Atty: Christopher Keane	03335108	Circuit Court, Wayne County, State of Michigan
02/28/05	Alison Steubing and Matthew Steubing, individually and on behalf of Julius Steubing, a minor child vs. Salt Lake Regional Medical Center, Cynthia Jones, M.D., and University of Utah Health Sciences Center aka University of Utah Medical Center Atty: Colin King	010901706	Third Judicial District Court, Sale Lake County, State of Utah
03/08/05	Stephanie Trout vs. Neil Kreyche and Tatyana P. Budnikova as next friend and parent of Tanaya Budnikova, a minor. Atty: Tim Buxton	03CV2274	District Court, Arapahoe County, State of Colorado
03/14/05	Nancy L Miller vs. Coralie A. Whaley Atty: Lorraine Parker	2004CV5701	District Court, Denver County, State of Colorado
03/22/05	Aaron Paul Aldaco, a minor by and through his next friends, Paula Aldaco and Juan Aldaco, his natural parents, and Paula and Juan Aldaco, individually, vs. George Mathews, D.O., and St. Catherine Hospital, Inc. Atty: Brad Prochaska	03CV321	Eighteenth Judicial District Court, Sedgwick County, State of Kansas
03/28/05	Bryan Edgar White, and Delma White vs. Rodney W. Merrell, M.D., Chad Merrell, M.D., Michael H. Williams, M.D. Atty: Norm Younker	010100918MP	In the District Court of the First Judicial District in and for Box Elder County, State of Utah



03/29/05	Jenifer Vasquez, individually and as Paren and Next Friend of Joshua Gehrke, a minor vs. Dennis M. Weisbrod, M.D.; Colorado OB-GYN Associates, P.C.; Pamela J. Prac, C.N.M.; HCA-Healthcare, L.L.C f/k/a Presbyterian St. Luke's Medical Center, d/b/a Denver Nurse Midwives; Pamela L. Kimbrough, M.D.; David C. Forschner, M.D.; and Rocky Mountain Women's Care, P.C. Atty: Jim Leventhal	2002CV4835	District Court, City and County of Denver, State of Colorado
03/31/05	John M. Longo vs. Regis Jesuit High School Corporation DBA Regis Jesuit High School Atty: Laurie Paddock	02-F-1957	United States District Court, District of Colorado, State of Colorado
04/15/05	Mark H. Wilkinson, an individual; and Sheila Rae Wilkinson, an individual vs. CNH America, LLC, a foreign limited liability and John Does 1-3 Atty: John Hansen	1:04CV0032bsj	United States District Court, District of Utah, Central Division, State of Utah
05/09/05	Kerayon Owens, a minor, by his next friend and mother, Kanithia Owens, and Kanithia Owens, individually, vs. Harper-Hutzel Hospital dba University Health Center dba DMC Hospital Partnership; Theodore Benj Jones, M.D.; Amanda Fern Johnson, M.D.; Diane Vista-Deck, M.D., individually, jointly, and severally. Atty: Jesse Reiter	03-340789-HN	Circuit Court, Wayne County, State of Michigan
05/16/05	Donna and Jay Clark, husband and wife, vs. Portneuf Medical Center, Inc., FKA Bannock Regional Medical Center, and Marsha Lowry, RN Atty: Lynn Harris	CV-2003-5401-PI	District Court of the Sixth Judicial District, Bannock County, State of Idaho
05/31/05	First National Bank & Trust Company of Mountain Home, guardian of the estate of Alexandria Knox, a minor, vs. Ford Motor Company and Debbie Hembrey, Personal Representative of the Estate of Mildred Alene Carter, Deceased. Atty: Sue Lister	CV2003-308-1	Circuit Court, Boone County, State of Arkansas

06/03/05	Martyn and Traci Mallory, individually, and on behalf of Sara Mallory, a minor, vs Douglas E. Smith, M.D. Atty: Steven Andersen	CV0C0003575D	District Court of the Fourth Judicial District, ADA County, State of Idaho
06/07/05	Daniel Zaroff and Sally Zaroff vs. Genesys Regional Medical Center, Genesys Health Systems, Genesys Neurosurgical Associates and Clifford Douglas, M.D., jointly and severally. Atty: Michael Behm	04-078651-NH	Circuit Court, Genessee County, State of Michigan
06/20/05	Michael M. Warren and Kathy M. Warren vs Phillip Horsman and All Mountain Sports, LLC a Colorado Limited Liability Company. Atty: Tony Durrett	03CV591	District Court, Eagle County, State of Colorado
07/06/05	Shawn L. Lords and Paula A. Lords, individually and as parents and guardians of Cody Tyler Lords and Stetson Broadly Lords, minors vs. Werner Enterprises, Inc., and Richard M. Overman. Atty: David Olsen	040906507	Third Judicial District Court, Sale Lake County, State of Utah
07/13/05	David W. Wirtz and Cathy A. Wirtz vs. Colin P. Curtis and American National Property and Casualty Company, Defendants and Tricare f/k/a Civilian Health and Medical Program of the Uniformed Services a/k/a Champus, Nominal Defendants. Atty: Jim Weis	04CV108, 30107	Circuit Court, Vilas County, State of Wisconsin
07/18/05	Karl Sweat and Hope Sweat vs. Ford Motor Company, Butterfield Ford, Inc., and Jamie Bowers, and John and Jane Does 1 15 Atty: Robert Sykes	040909462	Third Judicial District Court, Salt Lake County, State of Utah
08/02/05	Virginia "Gina" Diamond-McGrail and David McGrail, individually, and as next friends of Joseph McGrail, a minor vs. Scott Graham, HCA-HealthOne, LLC, d/b/a Swedish Medical Center, and South Denver Obstetrics and Gynecology, P.C. Atty: Jeff Bogue	04-CV-4323	District Court, Denver County, State of Colorado

08/03/05 Karl Sweat and Hope Sweat vs. Ford Motor 040909462 Third Judicial District Court,  
Company, Butterfield Ford, Inc., and Jamie Bowers, and  
John and Jane Does 1 15 Salt Lake County, State of Utah  
Atty: Robert Sykes

08/09/05 Karl Sweat and Hope Sweat vs. Ford Motor 040909462 Third Judicial District Court,  
Company, Butterfield Ford, Inc., and Jamie Bowers, and  
John and Jane Does 1 15 Salt Lake County, State of Utah  
Atty: Robert Sykes

08/09/05 Kathryn Chandler-McPhail vs. 04-CV-2679 District Court, El Paso County,  
James Duffey, M.D., Theodore Stringer, M.D.,  
and Colorado Springs Orthopaedic Group, P.C.  
Atty: Joe Bennett State of Colorado

08/15/05 Donald E. Kilgore and Carole A. Kilgore D-0101-CV-2003-00941 Sante Fe County, State of New  
vs. Subaru of America, Inc., a foreign corporation; Mexico  
Subaru-Isuzu Automotive, Inc., an Indiana Corporation; Subaru of Indiana Automotive,  
an Indiana corporation; Fuji Heavy Industries, LTD., a foreign corporation; Fuji Heavy  
Industries U.S.A. Inc., a foreign corporation; Lee Gables Subaru, a New Mexico corporation;  
Takata Corporation; a foreign corporation believed to be headquartered in Japan; Takata Inc., a  
Delaware corporation; TK Holdings, a foreign corporation; TK Holdings Inc., a Delaware corporation;  
Takata Restraint Systems, Inc., a Delaware corporation; Takata North America, Inc., a foreign  
corporation; Takata Seatbelts, Inc., a foreign corporation; Takata Seatbelts Inc., a Delaware corporation;  
Automotive Systems Laboratory Inc., a foreign corporation; Irvin Automotive Products, Inc., a foreign  
corporation; Irvin Industries, Inc., a foreign corporation; Irvin Automotive Industries, Inc., a foreign  
corporation; Halle & Stieglitz, Inc., a foreign corporation; Halle Industrial Group, Inc., a foreign  
corporation; Halle Industries, Inc., a foreign corporation; Irvin Industries, Inc., N.Y., a foreign  
corporation; Irvin Industries, Inc., Michigan, a foreign corporation; and Takai Rika Co., LTD., a foreign  
corporation.  
Atty: Sue Lister

08/22/05 Daniel Kuffer, a minor, by his 04-4306NH Circuit Court, Macomb County,  
next friend, Donna Kuffer v. State of Michigan  
Mount Clemens General Hospital, Inc.,  
individually and doing business as Mount  
Clemens General Hospital; Mount Clemens General Hospital, Inc.,  
individually and doing business as Mt. Clemens Women's Health  
Associates, an assumed name; Jill K. Hurt, D.O., Lawrence M. White, D.O., and  
Enid M. Roberts, M.D., jointly and severally.  
Atty: Christopher Keane

08/30/05 Vince Sukauskas v. Benjamin Zapata 03-0500340 Fifth Judicial District Court,  
DBA BZ Cleaning; Albertsons, Inc.;  
and Building One Service Solutions, Inc.  
Atty: Brad Harr Washington County, State of Utah

08/31/05 Scott J. Starley v. Crete Carrier 020907021P1 Third Judicial District Court,  
Corporation; John W. Castro; Cornhusker  
Motor Lines; Donald Griffee; Packerland  
Transportation; Jeffrey R. Stutzman; Arctic Air  
Express; Neal C. Hatfield; Estanislao Chavez, d/b/a  
Chavez Transportation; Jaime Urena, and John Does 1-20  
Jaime Urena, cross claimant v. Packerland Transportation;  
Jeffrey Stutzman; Scott Starley; Cornhusker Motor Lines; Donald  
Griffee; Arctic Air Express; Neal C. Hatfield; Crete Carrier  
Corporation; John W. Castro; and John Does 1-20, inclusive.  
Atty: J. Ryan Mitchell

09/12/05 Steven Kropf and Diane Kropf, as the 030102276 First Judicial District Court,  
natural parents and guardians of  
Amanda Kropf, a minor, v. Derrell W. Clarke, M.D.,  
Glenn O. Mortensen, M.D., Michael H. Williams, M.D.,  
and IHC Health Services Inc., d/b/a Logan Regional  
Hospital.  
Atty: Norm Younker Cache County, State of Utah

09/13/05 Paul VanWinkle, by and through 2004CV1013 District Court, Adams County, State of  
his guardian Dan VanWinkle, and  
conservator, Lana Cherie Van Winkle  
v. Daimler Chrysler Corp., Manheim Services Corp.  
d/b/a The Denver Auto Auction, Tandem Staffing  
Solutions, Ulase C. Hall, Bryan P. Mager  
and John Does 1 through 100, inclusive,  
whose true names are unknown.  
Atty: Jim Leventhal Colorado

09/19/05 Talisha Lyles, as next friend of 03-329219NH Circuit Court, Wayne County, State of  
Deontae Lyles, a minor, v.  
Hutzel Hospital.  
Atty: Brian McKeen Michigan

09/20/05	Janalyn D. Olsen and Jeffrey L. Olsen, v. American Fork City. Atty: Lynn Harris	030404853	Fourth Judicial District, Utah County, State of Utah.
09/21/05	Perry and Joy Ford, individually and as parents and next friend of Catherine Ford, a minor, v. Danny J. Eicher, M.D., Lara Lane, M.D., Consultants in Obstetrics and Gynecology, P.C., Nancy Finnegan, R.N., and HCA Healthone, LLC d/b/a Rose Medical Center Atty: James Puga	2003CV6635	District Court, City and County of Denver, State of Colorado
09/26/05	Lawrence Cheng Chon Shao vs. Denver Taxi, LLC, d/b/a Denver Yellow Cab, Paul Lo, and Brandon Jones. Atty: Jim Leventhal	04CV01965	United States District Court, District of Colorado, State of Colorado
09/27/05	Brenda Snowden vs. Exemple, Inc., d/b/a Exemple Lutheran Medical Center Atty: Natalie Brown	02CV3330	District Court, City and County of Denver, State of Colorado
09/30/05	Brenda L. Felthager and Jack D. Felthager, Jr. 03CV935 Denise E. Cruite, M.D., Catholic Health Initiatives d/b/a St. Mary Corwin Medical Center and Neurosurgical Associates of Southern Colorado P.C. Atty: James Puga		District Court, Pueblo County, State of Colorado
10/04/05	Teresa E. Nave vs. Hires Enterprises, Inc. d/b/a Hires Big-H Atty: Jeff Eisenberg	020912855	Third Judicial District Court, Salt Lake County, State of Utah
10/12/05	JoAnne Christy and Rick Christy vs. Dixie Regional Hospital, and Intermountain Healthcare, Inc., and Gregory D. Price, M.D. Atty: Bob Sykes	020502148	Fifth Judicial District Court, Washington County, State of Utah

11/21/05

Douglas Kahn vs Martin Boublik, M.D.,  
 Brian Kothe, P.A.C., Denver Sports  
 Performance Enhancement Center Professional,  
 LLC, d/b/a Steadman Hawkins Denver Clinic and d/b/a  
 Steadman Hawkins Clinic-Denver, Cynthia M. Kelly, M.D.,  
 Colorado Orthopedic Specialists Professional, LLC, d/b/a  
 Colorado Limb Consultants and d/b/a Steadman Hawkins  
 Denver Professional, LLC, Jana M. Crain, M.D.,  
 Charles Ho, M.D., Diagnostic Health Corporation, d/b/a  
 Healthsouth Open MRI of Denver, and California Advanced  
 Imaging Medical Associates, Inc., d/b/a National Orthopedic  
 Imaging Associates  
 Atty: Jim Leventhal

District Court, County of Denver,  
 State of Colorado

12/06/05

Shonda Gordon and Donald Gordon,  
 individually and as Parents of  
 Kristopher Gordon, a minor, vs.  
 Leo M. Stevenson, M.D. and Ogden  
 Regional Center, f/k/a St. Benedict's  
 Hospital; Hollister Incorporated; Ameda/  
 Egnell Corp; and Does I through V  
 Atty: Eric Nielson

040903837

Second Judicial District Court,  
 Weber County, Ogden Division,  
 State of Utah

**2005 TRIAL TESTIMONIES OF HELEN M. WOODARD**

01/05/05

Reynaldo Pena-Garcia vs. JC Bamford,  
 Ltd., an English corporation; JCB Materials  
 Handling, Ltd., an English corporation; JCB Sales, Ltd.,  
 an English Corporation; JCB Service, an English corporation;  
 JCB US Holding Co., a Delaware corporation; JCB Inc.,  
 a Maryland Corporation; Ritchie Bros. Auctioneers (America)  
 Inc., a Washington corporation; RYCO Equipment Leasing, LLP, a  
 Colorado limited partnership; Boddie Construction Company, Inc.,  
 a Michigan corporation, and James Kirkland  
 and

District Court, City and County of  
 Denver, State of Colorado

Third-Party Plaintiff:  
 Ritchie Bros. Auctioneers (America), Inc., a Washington corporation  
 vs. Third Party Defendants: Boddie Construction Company, Inc., a  
 Michigan corporation, and James Kirkland  
 Atty: Shelley Don



01/12/05	Tracy Ogrodnik and Scott Ogrodnik v. Richard P. Porreco, M.D., Lisa J. Farkough, M.D., Rocky Mountain Perinatal Associates, Rebekah Jean Ann Gass, M.D., Infectious Disease Consultants, P.C., Columbia-HealthOne, LLC, d/b/a/ Columbia/Presbyterian St. Luke Medical Center, Apria Health Care, PC, and Eleanor Diss Sabin, M.D. Atty: James Puga	99CV7212	District Court, City and County of Denver, Colorado
01/27/05 01/28/05	Marlus Hardy vs. Bayer Corporation, an Indiana corporation; Satnam Singh, dba Super Groceries, a Utah sole proprietorship; and John Does 1 through 10. Atty: Colin King	010902836	Second Judicial District Court, Weber County, State of Utah
01/31/05	Corinza M. Sullins, as guardian and conservator for Anita R. Sullins vs. Ford Motor Company, a Delaware corporation; Alliedsignal, Inc., a Delaware corporation; Honeywell International Inc., a Delaware corporation, and Breed Technologies, Inc., a Delaware corporation. Atty: Sue Lister	MID-L-9824-02	Superior Court, Middlesex County, State of New Jersey
02/15/05	Jerome J. Smith vs. The Burlington Northern And Santa Fe Railway Company, a Delaware corporation. Atty: Don D'Antuono/William Kvas	04-CV02289	District Court, Denver County, State of Colorado
02/16/05	Scott G. Howard vs. Ed Bozarth Chevrolet Company, Inc. Atty: Julie Bergquist-Heath/Sander Karp	02CV1960	District Court, Arapahoe County, State of Colorado
02/23/05	Howard Rudnick and Jennifer Szezey, As Next Friends for Edith Rudnick, a Minor vs. The Children's Hospital, Margaret Ferguson, M.D., Lila H. Monahan, M.D., Elizabeth Widner, R.N., M.M. Zitaglio, R.N., David R. Clarke, M.D., Mary M. Wollmering, M.D., Sheel K. Vatsia, M.D., Jeff Wagner, M.D. Mark Boucek, M.D. Atty: Jim Leventhal	02CV6264	District Court, City and County of Denver, State of Colorado

04/12/05	Stephanie Trout vs. Neil Kreyche and Tatyana P. Budnikova as next friend and parent of Tanaya Budnikova, a minor. Atty: Tim Buxton	03CV2274	District Court, Arapahoe County, State of Colorado
04/13/05	Anthony E. Harris vs. G. Stedman Huard II, M.D.; IHC Health Services, Inc. DBA Dixie Regional Medical Center; IHC Hospitals, Inc. DBA Dixie Regional Medical Center; and Intermountain Health Care, Inc. DBA Dixie Regional Medical Center. Atty: John Ray	010501894	Fifth Judicial District Court, Washington County, State of Utah
04/19/05	Bill L. Dorman vs. Powell Demolition, Inc. Atty: William Hansen	020913593	3 <sup>rd</sup> Judicial District Court, Salt Lake County, State of Utah
04/19/05	Allen Thurston, vs Jamison Door Company and Smith's Food & Drug Centers, Inc., a Delaware Corporation Atty: Michael Richman	020904317	In The Third Judicial District Court In and For Salt Lake County, State of Utah
04/20/05	Angelia Hall vs Viking Insurance Company of Wisconsin Atty: Cameron Tyler	04CV907	District Court, Division 3, Boulder County, State of Colorado
04/25/05	Robin E. Bianchi, as guardian of Stephen Michael Monske II vs. Banner Health (fka Banner Health System, fka Discovery Health system, fka Lutheran Health Systems), an Arizona corporation, dba Banner Desert Medical Center (fka Desert Samaritan Medical Center); The Samaritan Charitable Trust (fka Samaritan Health System) dba Desert Samaritan Medical Center; Salvatore Abate, M.D. and Jane Doe Abate, husband and wife. Atty: James Vieh, Attorney	CV2003-008027	Superior Court, Maricopa County, State of Arizona
04/26/05	Daniel S. Ruscetti vs. David M. Baron, M.D., David M. Baron, M.D., P.C. Atty: Jim Leventhal/Tim Buxton	2002CV991	District Court, Pueblo County, State of Colorado

05/23/05 Betty Zeller vs. Brian E. Nichols, M.D. 03CV2539 District Court, Boulder County, State of Colorado  
Atty: John Holland

08/18/05 David W. Wirtz and Cathy A. Wirtz vs. 04CV108, 30107 Circuit Court, Vilas County, State of Wisconsin  
Colin P. Curtis and American National Property and Casualty Company, Defendants and Tricare f/k/a Civilian Health and Medical Program of the Uniformed Services a/k/a Champus, Nominal Defendants.  
Atty: James Weis

09/23/05 Virginia "Gina" Diamond-McGrail and 04-CV-4323 District Court, Denver County, State of Colorado  
David McGrail, individually, and as next friends of Joseph McGrail, a minor vs. Scot Graham, HCA-HealthOne, LLC, d/b/a Swedish Medical Center, and South Denver Obstetrics and Gynecology, P.C.  
Atty: Jeff Bogue

10/11/05 Biana Faust, individually and as a 001-1915R United States District Court for the Western District of Washington, State of Washington  
guardian of Gary C. Faust, a minor, and Biana Celestine Mele, vs. Michael R. Caryl, as Personal Administrator of the Estate of Hawkeye Kincaid, deceased, Bellingham, Washington Lodge, #493, Loyal Order of Moose, Inc., John Does (1-10) (fictitious names of unknown individuals and/or entities) and ABC Corporation (1-10) (fictitious names of unknown individuals and/or entities).

Atty: James DeZao

11/18/05 Daniel Zaroff and Sally Zaroff vs. 04-078651-NH Circuit Court, Genessee County, State of Michigan  
Genesys Regional Medical Center, Genesys Health Systems, Genesys Neurosurgical Associates and Clifford Douglas, M.D., Jointly and Severally.  
Atty: Michael Behm

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12/12/05 Lanette McDonald vs. John C. Misko, M.D., 0303-02789  
Portland Neurological Associates, P.C.  
Atty: Jim Leventhal

Circuit Court, Multnomah County,  
State of Oregon

12/14/05 Kathleen Fleming and Paul Fleming 020905019  
vs Northern Utah Healthcare Corporation,  
d/b/a St. Mark's Hospital  
Atty: Edward McBride/Clark Newhall

Third Judicial District Court, Salt  
Lake County, State of Utah

**2006 DEPOSITIONS OF HELEN M. WOODARD**

01/10/06 Kristen Croasmun and Jon Croasmun 050100176  
vs. David T Roberts, M.D. and David T.  
Roberts, M.D., P.C.  
Atty: Lynn Harris

Fourth Judicial District, Utah County,  
State of Utah

01/17/06 Autumn Hyslop, a minor, by her next 04-415-NH  
friend and mother, Wendy Hyslop and  
Timothy Hyslop, individually vs.  
Cyrol Engmann, M.D., Maia McCuiston, M.D.,  
Megan Clipp, M.D., Jennifer Grow, M.D. and  
Janice Rourtk, M.D., individually and jointly and severely

Circuit Court, Washtenaw County,  
State of Michigan

Joined With:  
Autumn Hyslop, a minor, by her next 04-45-MN  
friend and mother, Wendy Hyslop and  
Timothy Hyslop, individually vs.  
The Board of Regents of the University of  
Michigan, d/b/a The University of Michigan Medical Center  
Atty: Jesse Reiter

Court of Appeals, State of Michigan

02/03/06 Zachariah Evans, a minor, by his next friend 04-79916-NH  
Robin Evans vs. McLaren Regional Medical  
Center, a Michigan corporation, Eplifania Aranas, M.D.,  
and Brian Nolan, M.D., jointly and severely  
Atty: Scott Weidenfeller

Circuit Court, Genessee County,  
State of Michigan

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02/07/06	Gina M. Arnold and Charlie Arnold, vs. Gary B. White, M.D.; Uintah Basin Medical Center; and David Grigsby, M.D. Atty: Roger Christensen	02-0800066	Eighth Judicial District Court, Duchesne County, State of Utah
02/14/06	Zachariah Evans, a minor, by his next friend Robin Evans vs. McLaren Regional Medical Center, a Michigan corporation, Epifania Aranas, M.D., and Brian Nolan, M.D., jointly and severely Atty: Scott Weidenfeller	04-79916-NH	Circuit Court, Genessee County, State of Michigan
02/10/06	Brooke Hammarstrom vs. Donald Joseph May, M.D., Alexander Philpott, M.D., Western Urologic Associates, P.C., James Randolph Hill, M.D., Marnie Lee Ceazan, M.D., Northern Medical Associates, P.C., and Rocky Mountain Lithotripter Limited Partnership Atty: Penny Chlor	3CV2908	District Court, Adams County, State of Colorado
02/15/06	Angel Bennett, as next friend of Kayla Kukawski, a minor, vs. Spectrum Health, a Michigan corporation and Harold Conrad, Jr., M.D., jointly and severally Atty: Norm Pylman	03-11396-NH	Circuit Court, Kent County, State of Michigan
02/20/06	Paula Litarowich vs. John R. Schwappach, M.D., and Colorado Orthopedic Consultants, P.C. Atty: Jim Leventhal	03CV3234	Division 401, District Court, Arapahoe County, State of Colorado
02/21/06	Dennis J. Cohn vs. Kirk M. Wanless, M.D. Atty: Mike Preston	04-C-1390	District Court, Shawnee County, State of Kansas
02/24/06	Shauna Yaussi vs. Inrawest/Winter Park Restaurant Corporation, a Delaware corporation Atty: Bill Marlin	05CV14	District Court, Grand County, State of Colorado

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02/27/06	Vickie Otterstrom and Wylie Otterstrom vs. IHC Health Services, Inc., dba IHC Health Center North Ogden; Steven W. Wynn, M.D.; IHC Health Services, Inc., dba McKay Dee Hospital Center; David A. Carlquist, M.D.; Philip Rutherford, M.D.; and James Milavetz, M.D. Atty: Norm Younker	040902636	2 <sup>nd</sup> Judicial District Court, Weber County, State of Utah
03/06/06	Jason A. Castellano vs. Steven J. Wheeler and Quicksilver Express Courier of Colorado, Inc. Atty: Jack Inderwish	2005CV6472	District Court, City and County of Denver, State of Colorado
03/28/06	Marylea Dornseif vs. Roy Carpenter Atty: Steven Shanahan	2005CV998	Larimer County District Court, State of Colorado
04/21/06	Phillip Boone and Denise Boone vs. Amy Embree, D.O., Providence Hospital and Medical Centers, Inc., d/b/a Providence Hospital, St. John Health, d/b/a St. John Health System, Kelly M. Krueger, D.O., George Nicoloff, M.D. and Prime Care of Novi, P.L.L.C., Jointly and Severally Atty: John Konkel	04061670-NH	Circuit Court, Oakland County, State of Michigan
04/24/06	Jennifer LaForrest vs. United States of America Atty: Brad Hall	05CV01031-RPM-PAC	United States District Court, District of Colorado
04/25/06	Robert and Paea Olah, individually and on behalf of Olena Olah, a minor vs. IHC Health Services dba Orem Community Hospital, Ronald Baird, D.O., Terry Sellers, M.D. Atty: Ruth Lybbert	040400994	Fourth Judicial District Court, Utah County, State of Utah
05/01/06	LeRoy McElveen vs. Arthur Carlin, M.D., Robert Crawford, M.D., Setti Rengachary, M.D., Ronald Davis, University Surgeons, P.C., and Harper-Hutzel Hospital, d/b/a Harper Hospital/ Harper University Hospital, Jointly and Severally Atty: Brian McKeen	05-503831NH	Circuit Court, Wayne County, State of Michigan

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05/09/06	Douglas Ward vs. Union Pacific Railroad Company, and John Does I-IV Union Pacific Railroad Company, Third-Party Plaintiff, vs. Loram Maintenance of Way, Inc., Third-Party Defendant. Atty: Erik Ward	100CV000139	United States District Court, District of Utah, Central Division
05/10/06	Adam Merce, an individual, and Emily Demong, an individual, vs. Mark W. Greenwood, M.D., David M. Pope, M.D., Kirk R. Anderson, M.D., IHC Health Services, Inc., dba Sevier Valley Hospital and IHC Health Services, Inc., dba Utah Valley Regional Medical Center. Atty: Cory Mattson	04 CV00610	United States District Court, District of Utah
05/15/06	Randy Overman vs. Gases Plus Atty: Wes Reeves	82782B	Seventh Judicial District, Natrona County, State of Wyoming
05/16/06	Sara Clay, as Next Friend for Simon Clay, a minor, vs. Hackley Hospital; Lourice L. David, M.D.; and Lourice L. David, M.D., P.C. Atty: Jane Beckering	0543666NH	Circuit Court, Muskegon County, State of Michigan
05/17/06	Kenneth D. Given vs. Michael L. Girard, M.D. and HCA-Healthone, LLC d/b/a The Medical Center of Aurora Atty: Jim Leventhal	04-CV-4698	District Court, Arapahoe County, State of Colorado
06/12/06	Jonathon Cassar, a minor, By His Next Friend and Mother, Diane Cassar vs. Maurine Horowitz, M.D., Anna Bida-Dudun, M.D. The Detroit Medical Center, a Michigan Nonprofit Corporation, d/b/a DMC Hospital Partnership, d/b/a Sinai Hospital of Greater Detroit, a Michigan Nonprofit Corporation, d/b/a Sinai-Grace Hospital, DMC Health Care Centers, Inc., a Michigan Profit Corporation, Individually, Jointly and Severally. Atty: Jesse Reiter	05-510907-NH	Circuit Court, Wayne County, State of Michigan

06/19/06	Charlene Alfaro, Antonio Alfaro, and Jonah Alfaro, through his next friends, Charlene and Antonio Alfaro vs. Longmont United Hospital Atty: Vicky Koury	05CV58	District Court, Boulder County, State of Colorado
07/05/06	Sara Clay, as Next Friend for Simon Clay, a minor, vs. Hackley Hospital; Lourice L. David, M.D.; and Lourice L. David, M.D., P.C. Atty: Jane Beckering	0543666NH	Circuit Court, Muskegon County, State of Michigan
07/12/06	Moises Carranza-Reyes vs. Park County, a public entity of the State of Colorado and its governing board, The Park County Board of County Commissioners, Park County Sheriff's office, a public entity of the State of Colorado; Fred Wegener, individually and in his official capacity as sheriff of Park County, Colorado; Monte Gore, individually and in his capacity as captain of Park County Sheriff's Department; Vickie Paulsen, individually and in her official capacity as registered nurse for Park County, Colorado; James Bachman, M.D., individually and in his official capacity as medical director of the Park County Jail. Atty: William Trine	2005WM377	United States District Court, District of Colorado, State of Colorado
07/24/06	Ralph Winber vs. Jerry S. Miklin, M.D. and Rocky Mountain Heart Associates, P.C. Atty: Jim Leventhal	05CV1519	District County, Jefferson County, State of Colorado
07/26/06	Marianne Furniss, Daniel Wollschlager, and Janet Wollschlager, vs. Associated Food Stores, Inc., and Michael T. Tremayne. Atty: Jack Helgesen	040904248	Third Judicial District Court, Salt Lake County, State of Utah
08/07/06	Lance Erskine and Theresa Erskine vs. Gloria Beim, M.D., and Alpine Orthopaedics and Sports Medicine, P.C. Atty: Sommer Stephens	2004CV89	District Court, San Miguel County, State of Colorado



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08/30/06 Jacob Eversole vs. Valley Design & Construction, Inc.; Michael Smith; and Does I-V Atty: Erik Ward	980700047PI	Second Judicial District Court, Davis County, State of Utah
09/14/06 Audrey M. Evon, Conservator of the Estate of Gien Roberts vs. W. Putnam Wolcott, M.D.; and Northern Michigan Hospital, jointly and severally. Atty: Saulius Polteraitis	05-8686NH	57 <sup>th</sup> Circuit Court, Emmet County, State of Michigan
09/15/06 Eric Brandaw, et al. vs. The Ryland Group, Inc., d/b/a Ryland Homes, Inc., a Maryland corporation W.B.E. or Colorado, Inc., d/b/a Ranger American of Colorado, Inc., a Delaware corporation, etc. al. Academy Roofing, Inc., a Colorado corporation Alliance Roofing, Inc. Atty: Ken Fredericksen	2004CV767	District Court, Douglas County, State of Colorado
09/15/06 Stacey Luster and Walter Luster, individually, and as parents and Next Friends of Alyssa Luster, a minor vs. Judith M. Brinkman, M.D. and Colorado Springs Health Partners, P.C. Atty: Natalie Brown	2004CV2642	District Court, El Paso County, State of Colorado
09/20/06 Amber E., as the mother and next of friend Kamerin E., a minor vs. Jacques Beveridge, M.D. d/b/a Popo Agie Women's Clinic and Lander Valley Medical Center, LLC a Delaware, LLC Atty: John Hursh	05CV183J	United States District Court, District of Wyoming, State of Wyoming

09/25/06	Elaine B. Visser, by and through her Court-Appointed Conservator, Janice Eder vs. The City of Colorado Springs, d/b/a Memorial Hospital, Bryan Mahan, D.O., Curtis Fox, M.D., James D. Albert, M.D., Timothy Reynolds, and C. Matthews, P.A., Colorado Springs Cardiothoracic Surgery, P.C. And Anesthesia Associates of Colorado Springs, P.C. Atty: Jim Leventhal, Peter Goldstein	03CV1244	Division Three, District Court, El Paso County, State of Colorado
09/28/06	William Aceves and Cynthia Smith vs. Exempla, Inc., Exempla St. Joseph Hospital, and Anant Kumar, M.D. Atty: William Trine	2005CV4514	District Court, City and County of Denver, State of Colorado
09/29/06 & 10/05/06	Carli Bartholomew, a Minor, by her next friend and mother, Melissa Hobbs, vs. Trinity Health-Michigan, a Michigan non-profit corporation, formerly known as Mercy Health Services, d/b/a St. Joseph Mercy-Pontiac, Laila Shehadeh, D.O. and Dov Schuchman, M.D., individually, jointly and severally, and St. Joseph Mercy Hospital-Pontiac, Third-Party Plaintiff and Counter-Defendant, vs. Dr. Laila Shehadeh and Bi-County Community Hospital, an assumed name for Detroit Osteopathic Hospital Corporation, a domestic nonprofit corporation, Third-Party Defendants and Counter-Plaintiffs. Atty: Robert Ellenstein, J. Kelly Carley	05063971NH	Circuit Court, Oakland County State of Michigan
10/02/06	Craig Reynolds, M.D. vs. The Doctors' Company, an Interinsurance Exchange Atty: Lorraine Parker	05CV3005	District Court, Denver County,
10/09/06	David and Annie Andrews vs. Albertson's Inc. Atty: Erik Ward	040700005	Second Judicial District Court, Davis County, State of Utah
10/27/06	Keri Hadley vs. Erika C. Lloyd, M.D.; Robert G. Naylor, M.D.; Robert G. Naylor Surgical, Inc. Atty: Robert Fuller		Private Arbitration Panel, Under Utah Uniform Arbitration Act, Francis J. Carney, Presiding Arbitrator

10/30/06 Thomas P. Haney and Dawn L. Haney vs. 03CV8040 District Court, City and County of  
Frank D. Massey, M.D., Kaiser Foundation Denver, State of Colorado  
Health Plan of Colorado, a Colorado Corporation;  
and Colorado Permanente Medical Group, P.C., a  
Colorado corporation.  
Atty: Shelley Don

10/31/06 Leticia Trejo, as parent and next friend of 04CV2523 United States District Court, For the  
Almir Trejo, a minor vs. Kathleen Franklin, District of Colorado, State of  
C.N.M, Margaret Willett, C.N.M., Rocky Mountain Colorado  
Midwives, Pelham Staples, M.D., Paul Cohen, M.D.,  
The Community Hospital Association, d/b/a Boulder  
Community Hospital, and Renee Huber, R.N.  
Atty: James Puga

11/01/06 Dennis Paplow vs. Dennis G. Barton, and 05CV950 District Court, Adams County, State of  
Agilent Technologies  
Atty: Wade Eldridge

11/27/06 Craig Bush and Susan Bush, as parents 2005CV2509 District Court, Denver County, State  
And next friends of Bradford Bush, a minor Of Colorado  
vs. Robert J. Wester, M.D., Robert J. Wester, M.D.,  
P.C., Carolyn Kabir, M.D., and HCA-Healthone LLC  
d/b/a Rose Medical Center f/k/a Columbia Healthone LLC  
Atty: Jim Leventhal

12/07/06 Albertina White as Next Friend of 04-171-MH Circuit Court, Washtenaw County, State  
Brittany White, a minor vs. Samuel G. McNeeley, M.D., of Michigan  
Sandray Gottwald, M.D., Taffy Dorsey, M.D., and  
Karl Deluga, M.D.  
Atty: Euel Kinsey

12/12/06 Annalee Rupp and Blair Rupp vs. Granite 040924219 Third Judicial District Court, Salt  
Construction Company of Utah, a corporation; Lake County, State of Utah  
Riley Transportation Consultants, Inc., and  
Does 1 through 10  
Atty: David Olsen

12/13/06	Robert N. Bettenhausen, as parent and next friend of Matthew V. Bettenhausen vs. Ronald E. Kramer, M.D. and Mountain States Neurology, P.D. d/b/a Colorado Neurology, P.C. Atty: Jim Leventhal	04CV02562RPM	United States District Court, District Of Colorado, State of Colorado
12/14/06	Lorraine Gorham, as Next Friend of Jacob Gorham, a minor vs. Dr. E. Capill, M.D., David C. Thorrez, M.D., Oakwood United Hospitals, Inc., d/b/a Beyer Memorial Hospital, Seetha Shankaran, M.D., and Children's Hospital of Michigan, jointly and severally. Atty: Brian McKeen	041197NH	Circuit Court, Washtenaw County, State of Michigan
<b>2006 TRIAL TESTIMONIES OF HELEN M. WOODARD</b>			
01/31/06	Frederic R. Schubert, vs. Crossroads Mental Health Services, Inc., and Mausau Business Insurance Company and State of Wisconsin Department of Health and Family Services. Atty: Jim Weis	04-CV127	Circuit Court, Taylor County, State of Wisconsin
02/08/06	Kristi Gilbert vs. Marilyn Welp, individually as the Alter Ego of Welp Farms Inc. Atty: James Puga	02CV1439	District Court, Weld County, State of Colorado
02/28/06	Dennis Hotz vs. Utah Alcoholism Foundation and John Does I-XX Atty: Elizabeth Bowman	030900377	Third Judicial District Court, Salt Lake County, State of Utah
03/01/06	Donald Allison and Linda Allison, vs. Lawrence Merkel, M.D. Atty: Debbie Taussig	2003CV1648	District Court, Larimer County, State of Colorado
03/07/06	Loni Curtis and Derrel Curtis vs. Larry G. Leonard, M.D. and Larry G. Leonard, M.D., P.C. Atty: Lynn Harris	040900264	Third Judicial District Court, Salt Lake County, State of Utah

03/08/06 Shauna Yausi vs. Inrawest/Winter Park 05CV14 District Court, Grand County,  
Restaurant Corporation, a Delaware State of Colorado  
corporation  
Atty: Bill Marlin

03/22/06 Perry and Joy Ford, individually 2003CV6635 District Court, City and County of  
and as parents and next friend of Denver, State of Colorado  
Catherine Ford, a minor, v. Danny J. Eicher, M.D.,  
Lara Lane, M.D., Consultants in Obstetrics and  
Gynecology, P.C., Nancy Finnegan, R.N., and  
HCA Healthone, LLC d/b/a Rose Medical Center  
Atty: James Puga

04/18/06 Brenda L. Felthager and Jack D. Felthager, Jr. 03CV935 District Court, Pueblo County,  
Denise E. Cruite, M.D., Catholic Health Initiatives State of Colorado  
d/b/a St. Mary Corwin Medical Center and  
Neurosurgical Associates of Southern Colorado P.C.  
Atty: James Puga

04/18/06 Jennifer Vasquez, individually and as 2002CV4835 District Court, City and County of  
Paren and Next Friend of Joshua Gehrke, Denver, State of Colorado  
a minor vs. Dennis M. Weisbrod, M.D.;  
Colorado OB-GYN Associates, P.C.; Pamela  
J. Prac, C.N.M.; HCA-Healthcare, L.L.C  
f/k/a Presbyterian St. Luke's Medical  
Center, d/b/a Denver Nurse Midwives;  
Pamela L. Kimbrough, M.D.; David C.  
Forschner, M.D.; and Rocky Mountain Women's Care, P.C.  
Atty: Jim Leventhal

04/20/06 Brooke Hammarstrom vs. Donald Joseph 3CV2908 District Court, Adams County,  
May, M.D., Alexander Philpott, M.D., State of Colorado  
Western Urologic Associates, P.C.,  
James Randolph Hill, M.D., Marnie Lee  
Ceazan, M.D., Northern Medical Associates,  
P.C., and Rocky Mountain Lithotripter Limited  
Partnership  
Atty: Penny Chlor

05/16/06	Paula Litarowich vs. John R. Schwappach, M.D., and Colorado Orthopedic Consultants, P.C. Atty: Jim Leventhal	03CV3234	Division 401, District Court, Arapahoe County, State of Colorado
05/19/06	LeRoy McElveen vs. Arthur Carlin, M.D., Robert Crawford, M.D., Setti Rengachary, M.D., Ronald Davis, University Surgeons, P.C., and Harper-Hutzel Hospital, d/b/a Harper Hospital/ Harper University Hospital, jointly and severally Atty: Brian McKeen	05-503831NH	Circuit Court, Wayne County, State of Michigan
06/08/06	Michael R. Brown and Jennifer Brown vs. Thomas G. Lowe, M.D. Atty: James Guest	2004CV6836	District Court, City and County of Denver, State of Colorado
06/15/06	Andrew Vitetta and Janine Vitetta, individually and as parents and next friends for Krysta Marie Vitetta, a minor (Fortis Insurance Company, a Wisconsin corporation), vs Catholic Health Initiatives of Colorado d/b/a Penrose Community Hospital; Mary Land, M.D.; Kevin Corrigan, M.D.; Steen Reich, M.D.; Colorado Springs Health Partners, P.C.; Janet Dubrick, NNP; Mary Stilson, NNP, and Pediatric Medical Group of Colorado, P.C. Atty: Jim Leventhal	2004CV2023	District Court, El Paso County, State of Colorado
08/10/06	Amanda Sue Grant vs. Barry C. Grant Atty: Rich Humpherys	040919782	Third Judicial District Court, Salt Lake County, State of Utah
06/23/06	Susan and David Fritzler vs. Neil H. Allen, M.D., Women's Clinic of Greeley, P.C. Atty: Lorraine Parker	2004CV1627	District Court, Weld County, State of Colorado

09/13/06 Donald E. Kilgore and Carole A. Kilgore D-0101-CV-2003-00941 Sante Fe County, State of New Mexico

vs. Subaru of America, Inc., a foreign corporation;  
Subaru-Isuzu Automotive, Inc., an Indiana Corporation; Subaru of Indiana Automotive, an Indiana corporation; Fuji Heavy Industries, LTD., a foreign corporation; Fuji Heavy Industries U.S.A. Inc., a foreign corporation; Lee Gales Subaru, a New Mexico corporation; Takata Corporation; a foreign corporation believed to be headquartered in Japan; Takata Inc., a Delaware corporation; TK Holdings, a foreign corporation; TK Holdings Inc., a Delaware corporation; Takata Restraint Systems, Inc., a foreign corporation; Takata North America, Inc., a foreign corporation; Takata Seatbelts, Inc., a foreign corporation; Takata Seatbelts Inc., a Delaware corporation; Automotive Systems Laboratory Inc., a foreign corporation; Irvin Automotive Products, Inc., a foreign corporation; Irvin Industries, Inc., a foreign corporation; Irvin Automotive Industries, Inc., a foreign corporation; Halle & Stieglitz, Inc., a foreign corporation; Halle Industrial Group, Inc., a foreign corporation; Halle Industries, Inc., a foreign corporation; Irvin Industries, Inc., N.Y., a foreign corporation; Irvin Industries, Inc., Michigan, a foreign corporation; and Takai Rika Co., LTD., a foreign corporation.

09/19/06 Ottoniel Barrios, as the legal United States Court of Federal Claims Office of Special Masters  
representative of his minor son,  
Edgar Alexander Barrios, vs.  
Secretary of Health and Human Services  
Atty: Curtis Webb

10/04/06 Gloria Gina Alcon vs. Ronald Ray Spicer District Court, Pueblo County,  
Atty: James Crosnal State of Colorado

10/11/06	Rodney Steiner and Lori Steiner, Husband and Wife vs. Lynn Gaupin, M.D., Donald Bernson, M.D., Mark A. Fullmer, M.D., E. Bruce McIlff, M.D., Farrell Allen, MSPT, Utah Valley Physical Therapy/ Spinal Treatment and Rehab, IHC Hospitals dba Utah Valley Regional Medical Center, and Hospital Nurses Jane Does 1-10 and John Does 1-10 Atty: Darwin Fisher	00-0403587	Fourth Judicial District Court, Utah County, State of Utah
10/24/06	Rick Troup vs. Joni Wolever Atty: Brad Hall	2003CV832	District Court, Larimer County, State of Colorado
11/14/06	Lance Erskine and Theresa Erskine vs. Gloria Beim, M.D. and Alpine Orthopaedics and Sports Medicine, P.C. Atty: Jim Leventhal	2004CV89	District Court, San Miguel County, State of Colorado
<b>2007 DEPOSITIONS OF HELEN M. WOODARD</b>			
01/08/07	Sherry L. Emanuelson and Mark E. Emanuelson, vs. Bresnan Communications, LLC; John Does 1-10 and Yellow Partnerships I-X; and Black and White Corporations A-J.	84157	District Court, Natrona County, State of Wyoming
01/16/07	Tom Bates and Michelle Entriken Bates, individually and as parents and next friends of Hayley Bates, a minor vs. Richard Meisel, M.D., Yen Tran, M.D., Margaret O'Hara, M.D., Scott Roberts, M.D., Maternal-Fetal Medicine, Inc., University of Kansas School of Medicine -Wichita Medical Practice Association, Maternal Fetal Associates of Kansas, Anupong Chotimongkol, M.D. and Dodge City Healthcare Group, L.P., d/b/a Western Plains Regional Hospital Atty: Jim Leventhal	04CV5049	District Court, Sedgwick County, State of Kansas
01/17/07	Terry A. Brucker and Eric Brucker vs. Roaring Fork Family Physicians, P.C., John T. Findley, M.D., Richard A. Herrington, M.D., Scott Emery, M.D., and Intermountain Neurology, LLC Atty: Jim Puga	2005CV331	District Court, Garfield County, State of Colorado



01/23/07 Richard Ballard vs. Brian J. Thompson, M.D., 2005CV739 District Court, County of Larimer,  
Jeffrey Winkler, PA-C, Generalcare Health State of Colorado  
Services, Inc., Hugh McElwee, M.D., Paula  
Zellner, PA-C, and Center for Gastroenterology, P.C.  
Atty: Timothy Buxton

01/29/07 Tyler Keddington, a minor, through 030402995 Fourth Judicial District Court, Utah  
his guardians William and Janice County, State of Utah  
Robertshaw, William and Janice Robertshaw,  
individually as surviving parents of  
Rebecca Keddington, Mark Meldrum, as  
parent and guardian of Todd Meldrum and  
Travis Meldrum, minors, Danny C. Purser,  
and Jennifer Keyte Wright vs. Michelin  
North American, Inc., a foreign corporation,  
Michelin Americas Research & Development  
Corporation, a foreign corporation, and Fast  
Track Tire & Auto, Inc., a Utah corporation.  
Atty: Todd Weiler

02/22/07 Paul Galantowicz and Dawn Galantowicz, 03-654516NH Circuit Court, Ogemaaw County,  
individually, and Dawn Galantowicz, State of Michigan  
next friend of Lauren Galantowicz, a minor  
vs. West Branch Regional Medical Center,  
Darlene Cottle, CNM, J. Tambs, D.O. and  
West Branch Ob-Gyn, P.C., jointly and severally.  
Atty: Brian McKeen

02/27/07 Angel Bennett, as next friend of Kayla 03-11396-NH Circuit Court, Kent County,  
Kukawski, a minor, vs. Spectrum Health, State of Michigan  
a Michigan corporation and  
Harold Conrad, Jr., M.D., jointly and severally.  
Atty: Skip Pylman

03/01/07 Kenneth G. Snook vs. Versa Tech of Denver 05CV1554 District Court, Douglas County,  
Inc., a Colorado Corporation, Joyce Homes, Inc., State of Colorado  
a Colorado Corporation vs. Joyce Homes, Inc.,  
a Colorado corporation, Third Party Plaintiff  
vs. Total Interior Trim Systems, Inc., a  
Colorado Corporation.  
Atty: Leslie Stratton

03/07/07	Andrea Nelson, as the natural parent and guardian of Kylee Nelson, a minor vs. Jeffrey C. Schmidt, M.D., and IHC Health Services, Inc., d/b/a IHC Health Center, Sandy Atty: Norm Younker	0509000968	District Court, Third Judicial District, Salt Lake County, State of Utah
03/14/07	Dinah S. Bartch and Karl C. Bartch vs. Milton Kortthark and Alert Traffic Control, Inc., a Colorado corporation. Atty: Beth Crane	06CV101	District Court, LaPlata County, State of Colorado
03/19/07	Kasandra Teegarden and Travis Teegarden vs. IHC. Health Services, INC. d/b/a Utah Valley Regional Medical Center, Inc. Wound Care Clinic and Jon. B. Bishop, M.D. Atty: Norm Younker	050100182	Fourth Judicial District Court, American Fork Division, Utah County, State of Utah
03/21/07	Julie Reichert, Fred Reichert and Emma Reichert, through her next friends, Julie and Fred Reichert vs. Longmont United Hospital, Russell Reitingger Atty: Vicky Koury/Jeff Bogue	05CV745	District Court, Boulder County, State of Colorado
04/16/07	Andrea Nelson, as the natural parent and guardian of Kylee Nelson, a minor vs. Jeffrey C. Schmidt, M.D., and IHC Health Services, Inc., d/b/a IHC Health Center, Sandy Atty: Norm Younker	0509000968	District Court, Third Judicial District, Salt Lake County, State of Utah
05/14/07	Logan Van Kuren, a minor by his next friend and mother, Leara Garner vs. Board of Hospital Managers for the City of Flint, a Michigan non-profit corporation, dba Hurley Medical Center, Danish Alamsahi Alamy, M.D., and Robert Villegas, Jr., M.D. Individually, jointly and severally. Atty: Jesse Reiter, Jim McCullen	05827670HN	Circuit Court, Genesee County, State of Michigan
05/22/07	Kip Greathouse vs. Noorda Sheet Metal, Inc. and Does I-V Atty: Erik Ward	050921642	Third Judicial District Court, Salt Lake County, State of Utah

05/24/07	Sharon Bethel, Individually and as Conservator and Guardian of David Bethel, an incapacitated person, vs. United States of America, et. al Atty: Natalie Brown	05CV01336PSFBNB	United States District Court, District of Colorado, State of Colorado
06/14/07	Teresa Wood, as next of friend of Amanda Wood and Samantha Wood, minors vs. Edwin C. Weathington, M.D., Dr. Godfrey, M.D., and Sparrow Hospital, jointly and severally. Atty: Brian McKeen/Teresa Hohman	05-142-NH	Circuit Court, Ingham County, State of Michigan
06/15/07	Jeffrey Webb, et.al, vs. Thomas Gehrmann, D.C., and Atlas Chiropractic Center at Briargate, Inc. Atty: Tim Buxton	05CV3641	District Court, El Paso County, State of Colorado
06/29/07	Terrance P. Robley and Freddy J. Robley vs. Double Eagle Resorts, Inc., d/b/a The Double Eagle Casino, a Colorado corporation; and Colorado Casino Resorts, Inc., a Texas corporation. Atty: John McDermott	06CV141	District Court, Teller County, State of Colorado
07/03/07	Keith Jones vs. Bowie Industries, Inc., and Todd Christianson, individually and d/b/a Great Alaska Lawn and Landscaping, Inc. Atty: Michael Flanigan	3AN0410958CIV	Superior Court, Third Judicial District, State of Alaska
07/10/07	Mark Hodges and Robyn Huddens and Kelly Jean McLaughlin and Pinnacle Assurance vs. Aspen Base Operations, Inc., a corporation, and Aspen Aviation, Inc., a corporation. Atty: Dr. Susan Friery	05CV205	Division 3, District Court, Pitkin County, State of Colorado
07/11/07	Rebecca Slonsky, as Next of Friend of Nicholas Saums, a minor vs. Fadi A Bsar, M.D., St. John Hospital and Medical Center and St. John Health System, jointly and severally. Atty: Brian McKeen	05505162NH	Circuit Court, Wayne County, State of Michigan

07/17/07	Brenda Evans vs. Comcast of Colorado IX, LLC, 06CV00462-REB-Comcast of Colorado IX, LLC, Counter-Plaintiff vs. Brenda Evans, Counter-Defendant. Atty: Lisa Sahl	06-604805NH	United States District Court, District of Colorado, State of Colorado
07/23/07	Bernice Demps vs. Paul K. King, M.D., University Neurosurgical Associates, P.C., Detroit Receiving Hospital, and University Health Center Atty: Teresa Hohman	06-604805NH	Circuit Court, Wayne County, State of Michigan
07/26/07	Preservation Depo in Lieu of Testimony Ryan Traugher vs. Melanie D. Welker Atty: Nate Alder	020905597	Third Judicial District Court, Salt Lake County, State of Utah
08/02/07	John MacDonald, husband and next friend of Catherine MacDonald, a legally-incapacitated individual, and John MacDonald, individually vs. Spectrum Health Hospitals d/b/a Spectrum Health-Butterworth Campus, a Michigan corporation, Wayne Vanderkolk, M.D., David Figg, M.D., Academic Surgical Associates PLLC, and Towers Surgeons PC, jointly and severally. Atty: Norm Pylman	05-07144-NH	Circuit Court, Kent County, State of Michigan
08/07/07	Preservation Depo in Lieu of Testimony Leticia Trejo, as parent and next friend of Almir Trejo, a minor vs. Kathleen Franklin, C.N.M., Margaret Willett, C.N.M., Rocky Mountain Midwives, Pelham Staples, M.D., Paul Cohen, M.D., The Community Hospital Association, d/b/a Boulder Community Hospital, and Renee Huber, R.N. Atty: James Puga	04CV2523	United States District Court, For the District of Colorado, State of Colorado
08/09/07	Brad Geldnich, Heather Geldnich and Matthew Geldnich, minor, by his Guardian ad Litem, Attorney Gail Brown and Wea Insurance Corporation, vs. Midwest Medical Insurance Company, Angela Breckenridge, DO, and Wisconsin Patients Compensation Fund Atty: Jerome Hierseman	05-CV-099	Circuit Court, Washington County, State of Wisconsin

08/11/07

John MacDonald, husband and next friend of 05-07144-NH  
Catherine MacDonald, a legally-incapacitated  
individual, and John MacDonald, individually  
vs. Spectrum Health Hospitals d/b/a Spectrum  
Health-Butterworth Campus, a Michigan corporation,  
Wayne Vanderkolk, M.D., David Figg, M.D., Academic  
Surgical Associates PLLC, and Towers Surgeons PC,  
jointly and severally.  
Atty: Norm Pylman

Circuit Court, Kent County,  
State of Michigan

08/13/07

Brenda Malone, formerly know as Brenda 05-1285-NH  
Chropowicz, as next friend of Kristy  
Chropowicz, a minor vs. Emil Eric Ebner, M.D.,  
and Ella E.M. Brown Charitable Circle,  
d/b/a Oaklawn Hospital, jointly and severally.  
Atty: Sauls Polteraitis

Circuit Court, Calhoun County,  
State of Michigan

08/13/07

Preservation Depo in Lieu of Testimony  
Eric Brandaw, et al. vs. The Ryland 2004CV767  
Group, Inc., d/b/a Ryland Homes, Inc.,  
a Maryland corporation  
W.B.E. or Colorado, Inc., d/b/a  
Ranger American of Colorado, Inc., a  
Delaware corporation, etc. al.  
Academy Roofing, Inc., a  
Colorado corporation  
Alliance Roofing, Inc.  
Atty: Ken Frederickson

District Court, Douglas County,  
State of Colorado

08/15/07

Tonya Browning, as next friend of 05-534324NH  
Brandi Browning, a minor, vs.  
The Detroit Medical Center, Harper-  
Hutzel Hospital f/k/a Hutzel Hospital,  
Kaimin A. Wei, M.D., Suzanne Hall, M.D.,  
Lori Jeans Stack, M.D., Lisa Lynn Cardwell, M.D.,  
Janetta Andrea Coleman, M.D., Bradley Wayne Merrills, M.D.,  
Kathy Y. Jones, M.D., Robert A. Elliot, M.D., and  
Lisa B. Bazzett, M.D., jointly and severally.  
Atty: Terry Dawes

Circuit Court, Wayne County,  
State of Michigan

08/16/07	Kathryn Salas vs. Tooele Hospital Corporation, dba Mountain West Medical Center, Merrill T. Syphus, M.D., Michael I. Munford, M.D., Danesh Rahimi, M.D., Rajesh Shaw, M.D., and Mark E. Stevens, M.D. Atty: Jackie Carmichael/Jeff Eisenberg	050300340	Third Judicial District Court, Tooele County, State of Utah
08/17/07	Lillian Colleen Biddulph and Howard L. Biddulph, vs. Terrell L. Sellers, M.D.; R. Richard Rasmussen, M.D.; Utah Valley Regional Medical Center, a dba of IHC Health Services Inc.; and IHC Health Services, Inc., a Utah corporation. Atty: Ralph Dewsnap/Ruth Lybbert	040404076	Fourth Judicial District Court, Utah County, State of Utah
08/23/07	Preservation Depo in Lieu of Testimony Guadalupe Azocar, Individually and as Next Friend of Guadalupe Azocar, Jr., a Minor and Ricardo Azocar, a Minor, vs Ford Motor Company and Bailey Ford, Inc., a Texas corporation Atty: Sue Lister	2001-03-1322-G	In the District Court of Cameron County, Texas, 404 <sup>th</sup> Judicial District
08/24/07	Tara Berendes and Josh Berendes vs. Geneva Rock Products, Inc.; Riley Transportation Consultants, Inc; Utah Department of Transportation, a subdivision of the State of Utah; and the Estate of Thad Goodman, by and thru its Personal Representative Frank R. Goodman. Atty: Rich Humpheries	05CV00848J	United States District Court, Central Division, District of Utah, State of Utah
10/15/07	Michelle (Cooper) Murdoch, mother and next friend of Seth Cooper, a minor vs. Metropolitan Hospital aka Metro Health Hospital, Peter Kazkofsky, D.O. and Stephen C. Dalm, D.O., P.C., nka Complete Women's Care, P.C., Jointly and Severally. Atty: Norm Pyiman	0706828NH	Circuit Court, Kent County, State of Michigan

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10/16/07	Martha Hall vs. Progressive Rehab Network LTD, a Michigan corporation, and Jackie Cummins, jointly and severally, Chattanooga Group, Inc., a foreign corporation, jointly and severally. Atty: Christopher Keane	07704501	Circuit Court, Wayne County, State of Michigan
10/18/07	Toby Oshiro, by and through his Conservator and Guardian, Mary Oshiro, and Mary Oshiro individually vs. Denise Crute, M.D., Dexter Koons, M.D., and Parkview Medical Center, a Colorado non-profit corporation. Atty: Patric Lehouillier	2006CV430	District Court, Pueblo County, State of Colorado
10/19/07	Kathleen Fleming and Paul Fleming vs Northern Utah Healthcare Corporation, d/b/a St. Mark's Hospital Atty: Clark Newhall	020905019	Third Judicial District Court, Salt Lake County, State of Utah
10/24/07	Harlan Nielson and Aliessa Nielson, individually and as the parents and natural guardians of Dalton L. Nielson, a minor child; and Dalton L. Nielson, a minor child vs. United States Sports Specialty Association (USSSA); USSSA-Utah; City of Lehi; Shane Marshall; Randy Johns; John Kurtz; and Thomas Matthew Dietz Atty: Lynn Harris	050400047	Fourth Judicial District Court, Utah County, State of Utah
10/30/07	Gary Riedlinger as guardian of Edwina Riedlinger, an incapacitated individual, and Robert Riedlinger vs. Kizhakepat P. Karunakaran, M.D., K.P. Karunakaran, M.D., P.C., and Saint Mary's Hospital of Saginaw, Inc., jointly and severally. Atty: Teresa Hohman	0558702-NH2	Circuit Court, Saginaw County, State of Michigan

11/02/07	Theresa Luing, as parent and next friend for Jordan Huang, a minor vs. David R. Clarke, M.D., Fresenius Medical Care Cardiovascular Resources, Inc., f/k/a Perfusion Services of Baxter Healthcare Corporation f/k/a Psicor, Dan Hydrick, Deb Westbrook, Glenn R. Merritt, M.D., and John Armstrong, M.D. Atty: James Puga	2004CV2309	District Court, City and County of Denver, State of Colorado
11/05/07	Alysa Tothill vs. Daniel A. Oliver, Transervice Logistics, Inc., Jay's Food, Inc., International Warehouse Logistics Association, and John Doe, whose true name is unknown Atty: Jim Leventhal	05C4363	United States District Court, Northern District of Illinois, State of Illinois
11/12/07	Sharon L. Wallace vs. G. Marc Conner, D.P.M Atty: James Puga	05CV4130	District Court, El Paso County, State of Colorado
11/13/07	Stephen E. Stone and Karen Stone vs. David P. Mulica, M.D. Atty: Barry Tillis	2006CV11218	District Court, Denver County, State of Colorado
11/15/07	Mary M. Sanderson and George F. Sanderson vs. Markussun, Green & Jarvis, P.C.; Dennis H. Markussun, individually; James K. Green, individually; and William B. Stanton, individually Atty: Mari Bush	The Matter of Arbitration	
11/26/07	Maggie L. Warner vs. RIC Asherman, individually; and Cody Laboratories, Inc., a Wyoming corporation. Atty: Bryan Ulmer	23401	District Court, Park County, State of Wyoming
12/06/07	Jose Loredo, et al vs. Solvay American, Inc., et al Atty: Richard Meyer	C05699R	Third Judicial District, Sweetwater County, State of Wyoming



12/10/07	Andrew J. Peterson and Marci Peterson vs. Reve Risner, the Utah Department of Transportation, and the State of Utah Atty: Roger Christensen	050918017	Third Judicial District, Salt Lake County, State of Utah
12/18/07	Rachel Ann Mason vs. Brigham Young University, a Utah corporation Atty: Wayne Turley	06CV00826TS	United States District Court, District of Utah, State of Utah
12/21/07	Louise S. Munoz vs. Prosource of Denver, Inc., a Colorado Corporation Atty: Barry Roseman	06CV10774	District Court, City and County of Denver, State of Colorado
<b>2007 TRIAL TESTIMONIES OF HELEN M. WOODARD</b>			
01/25/07	Brooke Hammarstrom vs. Donald Joseph May, M.D., Alexander Philpott, M.D., Western Urologic Associates, P.C., James Randolph Hill, M.D., Marlie Lee Ceazan, M.D., Northern Medical Associates, P.C., and Rocky Mountain Lithotripter Limited Partnership Atty: Penny Chlor	3CV2908	District Court, Adams County, State of Colorado
02/26/07	Craig Bush and Susan Bush, as parents And next friends of Bradford Bush, a minor vs. Robert J. Wester, M.D., Robert J. Wester, M.D., P.C., Carolyn Kabir, M.D., and HCA-Healthone LLC d/b/a Rose Medical Center f/k/a Columbia Healthone LLC Atty: Jim Leventhal	2005CV2509	District Court, Denver County, State of Colorado
03/05/07	Amber E., as the mother and next of friend Kamerin E., a minor vs. Jacques Beveridge, M.D. d/b/a Popo Agie Women's Clinic and Lander Valley Medical Center, LLC a Delaware, LLC Atty: John Hursh	05CV183J	United States District Court, District of Wyoming, State of Wyoming
04/05/07	Espra Andrus vs. Mark Russell Fulgham and Standard Plumbing Supply, Inc. Atty: Elizabeth Bowman	040904243	Third Judicial District Court,

04/19/07	Stoney (Floyd) Hardesty v. Edward Pino, M.D., et al Atty: Tim Buxton	99CV348	District Court, La Plata County, Colorado
04/26/07	Kathryn Chandler-McPhail vs. James Duffey, M.D., Theodore Stringer, M.D., and Colorado Springs Orthopaedic Group, P.C. Atty: Joe Bennett	04-CV-2679	District Court, El Paso County, State of Colorado
05/16/07	Jayson Vezzoso vs. Chateau Aspen Condominium Association, a Colorado Corporation, and McCartney Properties Management Company, a Colorado Corporation, and John Does 1 through 100, whose true names are unknown. Atty: Jim Leventhal/Daniel Lipman	99CV78	Division 2, District Court, Pitkin County, State of Colorado
05/17/07	Gerard Rademacher and Sarah Rademacher vs. Bruce Katuna, M.D. and Longmont United Hospital Atty: Dan Gersh	2005CV587	District Court, Boulder County, State of Colorado
06/19/07	Clyde Ragland vs. Shelter Mutual Insurance Company and Shelter General Insurance Company Atty: Kevin Flesh	06CV1210	District Court, Jefferson County, State of Colorado
06/19/07	Diana Hecht and Alfonso Hecht vs. Michael Strescino and Peter Strescino Atty: Mickey Smith	05CV1101	District Court, Pueblo County, Division F, State of Colorado
06/28/07	Cynthia Kaye Leopardi vs. Alice Schermerhorn Atty: David Greene	05CV682	District Court, Adams County, State of Colorado
07/18/07	Moises Carranza-Reyes vs. Park County Board of County Commissioners; Fred Wegener, individually and in his official capacity as Sheriff of Park County, Colorado; Monte Gore, individually and in his official capacity as Captain of Park County Sheriff's Department and Vickie Paulsen, individually and in her official capacity as Registered Nurse for Park County. Atty: William Trine	05CV377	United States District Court, District of Colorado, State of Colorado

11/07/07 Tom Bates and Michelle Entriken Bates, 04CV5049 District Court, Sedgwick County,  
individually and as parents and next friends  
of Hayley Bates, a minor vs. Richard Meisel, M.D.,  
Yen Tran, M.D., Margaret O'Hara, M.D.,  
Scott Roberts, M.D., Maternal-Fetal Medicine, Inc.,  
University of Kansas School of Medicine-Wichita  
Medical Practice Association, Maternal Fetal Associates  
of Kansas, Anupong Chotimongkol, M.D. and Dodge  
City Healthcare Group, L.P., d/b/a Western Plains  
Regional Hospital  
Atty: Jim Leventhal

11/08/07 Harlan Nielson and Alliesha Nielson, 050400047 Fourth Judicial District Court,  
individually and as the parents and  
natural guardians of Dalton L. Nielson,  
a minor child; and Dalton L. Nielson, a  
minor child vs. United States Sports  
Specialty Association (USSSA); USSSA-Utah;  
City of Lehi; Shane Marshall; Randy Johns;  
John Kurtz; and Thomas Matthew Dietz  
Atty: Lynn Harris

11/29/07 Shaun Blake and Lisa Blake vs. Carber 05CV2111 District Court, Jefferson County,  
Huang, M.D. State of Colorado  
Atty: Jeff Bogue

**2008 DEPOSITIONS OF HELEN M. WOODARD**

01/08/08 Emmanuel Boykins Harris, a minor, by and 06602786NH Circuit Court, Wayne County,  
through his next friend, Sylvia Harris vs. State of Michigan  
Henry Ford Hospital and Henry Ford Health Systems  
Atty: Brian McKeen

01/10/08 Joel Borunda, a minor, by and through his 04CV70 District Court, Ford County,  
parent and natural guardian, Jessica Borunda, State of Kansas  
and Jessica Borunda vs. Anupong Chotimongkol, M.D.  
Western Plains Medical Complex, Women's Center,  
Dodge City Medical Center, and Aye Win, M.D.  
Atty: Jim Leventhal

01/14/08	Deno Ascone vs. Juan D. Lovato and Union Pacific Railroad Company Atty: Doug Cannon	050904696	District Court, Third Judicial District Court, Salt Lake County, State of Utah
01/18/08	Angela Rodriguez vs. Thomas R. Drake, M.D., Michael J. McMillan, M.D., Helen Turner, R.N., Centura Health d/b/a Littleton Adventist Hospital, Inpatient Consultants of Colorado, P.C., and Emergency Room Physicians at Porter Hospital, P.C. Atty: Jim Leventhal	2004CV3766	District Court, Arapahoe County, State of Colorado
01/21/08	Steven Baucom vs. Betty A. Wells Atty: Robert Steiert	07CV422	District Court, Arapahoe County, State of Colorado
01/22/08	Carrie Smith, as next friend of Jordan Smith, a minor, vs. Lili Levy, M.D., Rainbow Pediatrics, P.C., Keith C. Wilkinson, M.D., and Fozia N. Saleem Rasheed, M.D. and William Beaumont Hospital, jointly and severally. Atty: Teresa Hohman	06073469NH	Circuit Court, Oakland County State of Michigan
01/29/08	Booker Gregory, II, a minor by his next friend and mother, Nnenna Okey, and Nnenna Okey individually vs. Harper-Hutzel Hospital, a Michigan non-profit corporation, d/b/a DMC Hospital Partnership? Susan Berman, M.D., and Mark Redman, M.D., individually, jointly and severally. Atty: Jesse Reiter	06608775NH	Circuit Court, Wayne County, State of Michigan
02/11/08	Emmanuel Boykins Harris, a minor, by and through his next friend, Sylvia Harris vs. Henry Ford Hospital and Henry Ford Health Systems Atty: Brian McKeen	06602786NH	Circuit Court, Wayne County, State of Michigan

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02/12/08

James Armaly and D'Ane M. Armaly vs.  
Robert R. Johnson II, M.D., Jaliya  
Lokuketagoda, M.D., University Neurosurgical  
Associates, P.C. and Sinai-Grace Hospital, Jointly  
and Severally.  
Atty: Brian McKeen

0550844NH

Circuit Court, Wayne County,  
State of Michigan

03/17/08

Penny Cline and Richard Cline, M.D.,  
individually and as parents of Taylor  
Cline, a minor vs. Samuel Ellis, a minor;  
Greg Ellis M.D., and Leslie Ellis, parents  
of Samuel Ellis; and Does I-V  
Atty: Rhett Luncelford

050902705

Third Judicial District Court,  
Salt Lake County, State of Utah

03/18/08  
03/21/08

Pablo Cabrales-Lozano and Felipa Avila;  
Rogelio Chavez; Regulo Gonzalez-Cruz;  
Primitivo Arciniego and Maria Arciniego  
Navarrete; Luis M. Solis-Zepeda and  
Fatima Solis; Jaime B. Esparza and  
Guadalope Esparza; Thomas Alvarez;  
Jose Reyes-Miranda; Virginia Seruty Company,  
Inc.; and Cambridge Integrated Service Group,  
Inc. vs. Bridgestone/Firestone North American Tire,  
LLC a/k/a and/or n/k/a Bridgestone Firestone North  
American Tire, LLC; Bridgestone Firestone North American  
Tire, LLC, The Firestone Tire and Rubber Company;  
Bridgestone/Firestone, LLC; Bridgestone/Firestone, Inc.;  
Bridgestone Americas Holding, Inc.; Bridgestone Corporation;  
Bridgestone/Firestone Canada, Inc., a/k/a Bridgestone/Firestone  
Canada Inc.; Aclaim Rent-a-Car, Inc., and Ford Motor Company  
Atty: Rhett Klok/Paul Komyatte

05CV5469

District Court, Denver County,  
State of Colorado

03/26/08

Carrie Smith, as next friend of  
Jordan Smith, a minor, vs. Lili Levy, M.D.,  
Rainbow Pediatrics, P.C., Keith C. Wilkinson, M.D.,  
and Fozia N. Saleem Rasheed, M.D. and William  
Beaumont Hospital, jointly and severally.  
Atty: Teresa Hohan

06073469NH

Circuit Court, Oakland County  
State of Michigan

03/31/08	Naomi Gutowski, a next friend to Paige Gutowski, a minor, vs. Marvin Coy, D.O., Roger Shomo, D.O., Women's Center/OB Clinic, Krystyna Pasterska, M.D., Karl Joseph Komar, M.D., and Oakwood Hospital Corporation, jointly and severally. Atty: Brian McKeen	07706641NH	Circuit Court, Wayne County, State of Michigan
04/02/08	Sandra Sue Wretling as next friend and guardian ad litem for Mikayle Wretling a minor vs. Clifford M. Gall, M.D., Gregory W. Hornig, M.D., Frederick K. Hall, D.O., William Braun, M.D., Jennifer A. Lowry, M.D., And The Children's Mercy Hospital Atty: Daniel Giroux	0516CV25490	Circuit Court, Jackson County, State of Missouri
04/16/08	David Mullins and Vanessa Mullins, individually and on behalf of the Bridgett Mullins, a minor child vs. McNeil Consumer & Specialty Pharmaceuticals, a Division of McNeil-PPC, Inc.; and Johnson and Johnson Atty: Bill Zook/Ted Lyon	06-CV-00266PGC	United States District Court, District Of Utah, State of Utah
04/18/08	Larry Wagoner, an incompetent person, individually and by and through his conservator and guardian ad litem and next friend, Charilla Wagoner, and Cahrilla Wagoner, individually Atty: Rob Williams	07CV244-J	United States District Court, District Of Wyoming, State of Wyoming
04/30/08	Erica Scanlon and Kelly Scanlon vs. David Paetz, M.D., Diane Morfeld, CRNA, and Colorado Anesthesia Consultants, P.C. Atty: Natalie Brown	07CV0013	District Court, Denver County, State of Colorado

05/05/08	Ella Turner vs. University of Utah Hospitals and Clinics, University of Utah and State of Utah Atty: Matt Raty	040917707	Third Judicial District Court, Salt Lake County, State of Utah
05/21/08	Denise Staley and Leland Staley vs. Christopher Jolles, M.D., and Northern Utah Healthcare Corporation, d/b/a St. Mark's Hospital Atty: David Cutt	050916251	Third Judicial District Court, Salt Lake County, State of Utah
06/10/08	Shawn M. Anderson, an individual, vs. Natural Selection Foods, LLC, a California limited liability company; Natural Selection Foods Manufacturing, LLC, a California limited liability company; Dole Food Company, Inc., a Delaware corporation; Harms at the Brickyard, Inc., a Utah corporation; Mission Organics, LLC; and John Does 1 through 20 Atty: Richard Burbidge	070904323	Third Judicial District Court, Salt Lake County, State of Utah
07/01/08	Mandy Jo Kerr vs. Mueeza Zafar, M.D., Wheatland Medical Clinic, Glenn L. Shurtz, M.D. Atty: Brad Prochaska	06CV4650	Eighteenth Judicial District, Sedgwick County District Court, State Of Kansas
07/21/08	Toni Taylor, William Taylor, Tina Ruiz and Mark Ruiz vs. Ellis Ranch, Inc. a Colorado corporation, and Terry L. Ellis, individually Atty: Bruce Kaye	07CV800	District Court, Larimer County, State of Colorado
08/05/08	Jeffrey J. Winowiecki and Pinnacle Assurance vs. Black Hills Bentonite, LLC Atty: Roger Castle	08CV53J	District of Wyoming, State of Wyoming

08/20/08	Vasilios Haralampopoulos, by his guardian John Haralampopoulos vs. Jason L. Kelly, M.D.; Robert T. Rowland, M.D.; Mauricio L. Waintrub, M.D. Atty: Kristin White	2006CV12898	District Court, City and County of Denver, State of Colorado
08/25/08	Connor D. Lacy, by and through his parents and next friends, Jason Lacy and Wendie Razon; and Jason Lacy and Wendie Razon, individually vs. St. Luke's Hospital Association, et al. Atty: Marty Rosenburg	162006CA004644	Circuit Court, Fourth Judicial Circuit, in and for Duval County, State of Florida
08/26/08	Vasilios Haralampopoulos, by his guardian John Haralampopoulos vs. Jason L. Kelly, M.D.; Robert T. Rowland, M.D.; Mauricio L. Waintrub, M.D. Atty: Kristin White	2006CV12898	District Court, City and County of Denver, State of Colorado
09/08/08	Maralee McLean vs. Randolph Robinson, M.D., D.D.S., Park Meadows Cosmetic Surgery, P.C., Park Meadows Outpatient Surgery, L.L.C. Atty: Jim Leventhal	06CV0432	District Court, Arapahoe County, State of Colorado
09/09/08	James Russell Mechem and Lisa Mechem vs. IHC Health Services, Inc., dba Utah Valley Regional Medical Center, James A. Tatton, M.D., and Scott E. Bingham, M.D. Atty: Norm Younker	070400856	Fourth Judicial District Court, Utah County, State of Utah
09/22/08	Dominic Yeomans, a minor by and through his friend, Kathleen Yeomans vs. Henry Ford Health System, Clark P. Kirkman, M.D., and Anthony Lee Baisden, M.D. Atty: Craig Forhan	077114840NH	Circuit Court, Wayne County, State of Michigan
10/02/08	Kimberly Zundel and Charles Zundel, individually, and on behalf of their minor child Stephanie Zundel vs. Johnson and Johnson; McNeil Consumer Healthcare, a division of McNeil-PPC, Inc.; McNeil-PPC, Inc.; John Doe 1 through John Doe 50 (fictitious). Atty: Alan Anthony	L-6854-05	Superior Court, Middlesex County, State of New Jersey



10/07/08	Zaria Platt-Parker, a minor by her next friend and mother, Donna Parker Morgan, vs. Henry Ford Medical Center-Fairlane, an assumed name of Henry Ford Health System, a Michigan non-profit corporation; St. Mary Hospital of Livonia, a Michigan non-profit corporation; Sylvia J. Simon-Jones, M.D.; Susan Neal, M.D.; Timothy A. Johnson, M.D.; Wendy Valhoff, CNM; and Lynn M. Rife, CNM; individually, jointly and severally. Atty: Jesse Reiter	06-624891-NH	Circuit Court, Wayne County, State of Michigan
10/10/08	Lynnda A. Howard vs. Eric Scott Brecher, M.D. and Randall H. Gehl, M.D. Atty: Andrew Brake	07-CV-60	District Court, Mesa County, State of Colorado
10/16/08	Debra Ricci and Floyd Ricci vs. Frank Schinco, M.D. and Covenant Healthcare System, jointly and severally. Atty: Brian McKeen	07-66348-NH	Circuit Court, Saginaw County, State of Michigan
10/24/08	Matthew Pajak, a minor, by and through his parents and natural guardians, Betsy Pajak and Gregory Pajak, et. al, vs. Lakewood Hospital, et al. Atty: John Lancione	CV05564860	Court of Common Pleas, Civil Division, Cuyahoga County, State of Ohio
10/27/08	Kaye Jensen vs. Martin D. Jordan Atty: Erik Ward	070903892	District Court, Second Judicial District, Weber County, State of Utah
10/29/08	Jeshua Jones, Jr., a minor, by and through his parents and next friends, Joshua Jones, Sr., and Lisa Jones, and Jeshua Jones, Sr., and Lisa Jones vs. Yvonne Edmonds and Wal-Mark Stores, Inc. Atty: Gordon Vaughan	05CV4746	District Court, El Paso County State of Colorado
11/20/08	Gaynell Travis-Pashon and Lester Pashon vs. Susan A. Sgambati, M.D. Atty: Shelley Don	07CV4709	District Court, Denver County,

## 2008 TRIAL TESTIMONIES OF HELEN M. WOODARD

02/29/08	Keith Jones vs. Bowie Industries, Inc., and Todd Christianson, individually and d/b/a Great Alaska Lawn and Landscaping, Inc. Atty: Michael Flanigan	3AN0410958CIV	Superior Court, Third Judicial District, State of Alaska
03/12/08	Beckie Grabau and Daniel Grabau vs. Target Corporation Atty: Don Sisson	06CV01308	United States District Court, District of Colorado, State of Colorado
03/19/08	Tyler Keddington, a minor, through his guardians William and Janice Robertshaw, William and Janice Robertshaw, individually as surviving parents of Rebecca Keddington, Mark Meldrum, as parent and guardian of Todd Meldrum and Travis Meldrum, minors, Danny C. Purser, and Jennifer Keyte Wright vs. Michelin North American, Inc., a foreign corporation, Michelin Americas Research & Development Corporation, a foreign corporation, and Fast Track Tire & Auto, Inc., a Utah corporation. Atty: Pam Thompson	030402995	Fourth Judicial District Court, Utah County, State of Utah
04/07/08	Clint Butterfield and Heidi Butterfield Individually, and on Behalf of their minor daughter, vs. L. Jeffrey Chappell, M.D., Sevier Valley Hospital, IHC Health Services, Inc., and John Does, I-X Atty: Allen Young	020600390	Sixth Judicial District Court, Sevier County, State of Utah
04/16/08	Kurt Rossmiller vs. Tai Chan Ngo Atty: Paul Gordon	2005-CV-1760	District Court, City and County of Denver, State of Colorado
05/16/08	Irina Konstantinov, as Conservator for the estate of Vladimir Konstantinov, a mentally incapacitated person, and Sergei Mnatsakanov vs. Findlay Ford Lincoln Mercury Atty: Richard Goodman	04CV74928	United States District Court, Eastern District of Michigan, Southern Division, State of Michigan

06/09/08	Margaret K. Danielson and Steven R. Danielson vs. Vernon L. Naake, M.D. Atty: Pia Dean	05CV1319	District Court, Adams County, State of Colorado
06/12/08	Brad Geldnich, Heather Geldnich and Matthew Geldnich, minor, by his Guardian ad Litem, Attorney Gail Brown and Wea Insurance Corporation, vs. Midwest Medical Insurance Company, Angela Breckenridge, DO, and Wisconsin Patients Compensation Fund Atty: Jerome Hierseman	05-CV-099	Circuit Court, Washington County, State of Wisconsin
06/24/08 and 06/25/08	Karen Kokins, an individual, and the City of Westminster, a Colorado municipality vs. Teleflex, Incorporated Atty: Scott Larson and Roger Castle	06-CV-01018	United States District Court, District of Colorado, State of Colorado
07/07/08	Larry Wagoner, an incompetent person, individually and by and through his conservator and guardian ad litem and next friend, Charilla Wagoner, and Cahrilla Wagoner, individually Atty: Rob Williams/Richard Meyer	07CV244-J	United States District Court, District Of Wyoming, State of Wyoming
10/15/08	Jose G. Trujillo vs. Denver Zoological Foundation, Inc. Atty: Sander Karp	05CV00089LTB	United States District Court, District of Colorado, State of Colorado
<b>2009 DEPOSITIONS OF HELEN M. WOODARD</b>			
01/14/09	Kevin R. Anderson vs. City of Colorado Springs, dba Memorial Hospital Atty: Peter Goldstein	2008CV1040	Division III, District Court, El Paso County, State of Colorado
01/16/09	May Sullivan vs. Front Range Otolaryngology and Facial Plastic Surgery, P.C., a Colorado corporation, PPG MOB Fund 1A, LLC and Medical Properties Management Company, LLC Atty: Darin Locke	2008CV776	District Court, Boulder County, State of Colorado

01/29/09	Arthur D. Fuller, as surviving spouse and as personal representative for an on behalf of the estate of Ruby M. Fuller, deceased, vs. Thomas R. Huntington, M.D., FACS Atty: Alan Morton, Atty	CVPI0716090	District Court, 4 <sup>th</sup> Judicial District, ADA County, State of Idaho
02/11/09 02/12/09	Cynthia Cardenas, mother and next friend of Isabelle Perez vs. Vanda Jerath, M.D. and St. Anthony Hospital North Atty: Jim Leventhal	2006CV546	District Court, Adams County, State of Colorado
03/04/09	Kara Muller, by and through James Muller and Sherry Muller, as next friends, parents, and guardians vs. Varsity Spirit Corporation d/b/a Universal Cheerleading Association, Regis University Marcia Hoerl, Jeannie Balagna, Christina MacCarrone and Sandi Rosenau, jointly and severally Atty: Sam Stoorman	2007CV5613	District Court, City and County of Denver, State of Colorado
03/10/09	Mary K. Becker, individually, and as the guardian of David H. Becker, vs. Jason Bateman, in an individual and official capacity, Edward L. Rhoades, in an official capacity, and Heber City Corporation. Atty: Steve Russell	2:07CV311PFC	United States District Court, District Of Utah, State of Utah
03/11/09	Patricia S. Fletcher, a Utah resident vs. U-Haul Company of Arizona, an Arizona corporation d/b/a U-Haul Center Flagstaff, and John Does 1-10 Atty: Shawn Draney	CV0701193	United States District Court, District of Arizona, State of Arizona
01/08/09	John Hathaway vs. Heather Marie Nasakaitis Atty: David Greene	2007CV3061	Jefferson County, Division 11, State of Colorado

**2009 TRIAL TESTIMONIES OF HELEN M. WOODARD**

02/04/09 Kimberly Zundel and Charles Zundel, L-6854-05 Superior Court, Middlesex County, Individually, and on behalf of their minor child Stephanie Zundel vs. Johnson and Johnson; McNeil Consumer Healthcare, a division of McNeil-PPC, Inc.; McNeil-PPC, Inc.; John Doe 1 through John Doe 50 (fictitious). Atty: Alan Anthony

02/20/09 May Sullivan vs. Front Range Otolaryngology 2008CV776 District Court, Boulder County, and Facial Plastic Surgery, P.C., a Colorado corporation, PPG MOB Fund 1A, LLC and Medical Properties Management Company, LLC Atty: Darin Locke

03/03/09 Sharon Bethel, Individually and as 05CV01336PSFBNB United States District Court, Conservator and Guardian of David Bethel, an incapacitated person, vs. United States of America, et. al Atty: Natalie Brown

(Updated 03/19/09)